



U.S. DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

Division of Eligibility and Agency Evaluation

**ADVISORY COMMITTEE ON ACCREDITATION
AND INSTITUTIONAL ELIGIBILITY**

**ANNUAL REPORT
1978**

ADVISORY COMMITTEE ON ACCREDITATION AND INSTITUTIONAL ELIGIBILITY

MEMBER	EXPIRATION OF TERM	MEMBER	EXPIRATION OF TERM
CHAIRPERSON			
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Dr. Harold B. Crosby c/o Office of the President Florida State University Tallahassee, Florida 32306	June 30, 1979	Dr. R. Edd Miller Chairman Communications Program Northern Kentucky University Highland Heights, Kentucky 41078	June 30, 1979
Dr. Xavier A. Del Buono Associate Superintendent of Public Instruction Adult and Community Education California State Department of Education 721 Capitol Mall Sacramento, California 95814	June 30, 1981	Dr. Kristin Morrison Associate Professor of English Boston College Chestnut Hill, Massachusetts 02167	June 30, 1980
Dr. Cleveland L. Gernand President Atlanta University 223 Chestnut Street, S.W. Atlanta, Georgia 30314	June 30, 1979	Dr. Morris L. Norfleet President Morehead State University University Boulevard Morehead, Kentucky 40351	June 30, 1980
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Ms. Linda Hitt 4850 South Lake Park Apt. 311 Harper Square Cooperative Chicago, Illinois 60615	June 30, 1980	Dr. Joan S. Stark Dean School of Education University of Michigan Ann Arbor, Michigan 48106	June 30, 1981
Mr. Patrick Laughlin Executive Director Michigan Education Association 33 North River Road Mt. Clemens, Michigan 48043	June 30, 1979	Marguerite C. Thew, M.D. University of Pennsylvania Hospital 34 Spruce Street Philadelphia, Pennsylvania 19104	June 30, 1980
		EXECUTIVE SECRETARY John A. Proffitt, Director Division of Eligibility and Agency Evaluation Bureau of Higher and Continuing Education U.S. Office of Education 400 Maryland Avenue, S.W. Washington, D.C. 20202	
		There was one vacancy at the end of 1979.	

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INTRODUCTION

The Advisory Committee on Accreditation and Institutional Eligibility is established pursuant to Section 253 of the Veterans' Readjustment Assistance Act (Chapter 33, Title 38, U.S. Code), and subsequent legislation. It is governed by provisions of Part D of the General Education Provisions Act (P.L. 90-247 as amended; 20 U.S.C. 1233 et seq.) and the Federal Advisory Committee Act (P.L. 92-463; 5 U.S.C. Appendix I), which set forth standards for the formation and use of advisory committees. The Committee is established to advise the U.S. Commissioner of Education in fulfilling his statutory obligations to publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authorities concerning the quality of training offered by education institutions and programs. It also serves to advise the Commissioner in fulfilling his statutory obligation to publish a list of State agencies which he has determined to be reliable authorities concerning the quality of public postsecondary vocational education in their respective State, pursuant to Section 438(b) of the Higher Education Act of 1965, as amended by P.L. 92-318. A complete list of the Committee's functions, as well as its purpose and structure, can be found in the Committee Charter, Appendix I.

Advisory Committee Membership

The fifteen members of the Committee are representative of educational institutions, various levels and types of accreditation, professional associations, State departments of education, the general public and the student/youth population. They include representation from the ranks of women and minorities, and from all geographic regions of the country. The members are appointed to three-year terms by the Secretary of Health, Education, and Welfare. The composition of the Committee changes every June, when the terms of one-third of the members expire. Currently, there is one vacancy on the Committee. Ordinarily, no member is eligible for reappointment to a second consecutive term. Nominations for membership on the

Committee are welcome. Names, and resumes if available, should be submitted to the Director of the Division of Eligibility and Agency Evaluation, U.S. Office of Education. Although nominations are accepted at any time, those submitted by November of any year are most likely to be considered for terms beginning the following July, while those submitted after November are likely to be reserved for consideration one year later.

1978 Advisory Committee Actions

The Committee met five times during 1978. A scheduled sixth meeting was cancelled because of uncertainty regarding the filling of vacancies on the Committee. Instead, a meeting was held for a planning subcommittee of the Committee. All Committee and subcommittee meetings were open to the public. A continuing trend with the greater number of open meetings has been an increase in the number of individuals and organizations who, although they do not themselves have petitions pending before the Committee, appear for oral presentations regarding petitioning agencies. All Advisory Committee meetings are tape recorded, and the transcripts are available for examination in the offices of the Division of Eligibility and Agency Evaluation. A list of the 1978 Advisory Committee meetings is found in Appendix VII. Appendix VII also contains a list of scheduled meetings for 1978, and Appendix VIII includes a list of agencies scheduled for review through March 1983.

A large portion of the Committee's activity during 1978 revolved around the review of petitions and interim reports relating to the Commissioner's authority to list recognized accrediting and State approval agencies. The Committee reviewed 69 petitions and reports, and as a result of its recommendations, initial recognition was granted to three nationally recognized accrediting agencies, recognition was continued for nineteen agencies, and extension of scope of recognition was granted to six agencies. Presently, there are 75 nationally

recognized accrediting agencies and associations. As a result of Committee recommendations, recognition was continued for three State agencies for the approval of public postsecondary vocational education. Two agencies withdrew from the recognized list. Currently, there are ten recognized State agencies for the approval of public postsecondary vocational education. Recognition also was continued for six State agencies for the approval of nurse education. There are eight State agencies recognized for the approval of nurse education.

Accepting Committee recommendations, the Commissioner also awarded eligibility status for Federal funding programs to four institutions which demonstrated satisfactory assurance that they would meet the accrediting standards of a recognized agency within a reasonable period of time. The Commissioner's determinations of satisfactory assurance were made pursuant to his authority under the Higher Education Act of 1965, as amended, section 1201(a)(5)(A).

While most of the Committee's time is occupied with review of petitions, it also must review policy issues which affect accreditation and eligibility. During 1978, the Committee reviewed forty-six matters related to policy or administrative procedures, including proposed revisions to the Criteria for Recognition, proposed regulations governing institutional eligibility, recommendations concerning the proposed reauthorization of the Higher Education Act of 1965, and a recommendation for regulations to determine the eligibility of foreign medical schools for participation in the Guaranteed Student Loan Program. A discussion of the policies which the Committee reviewed is found in Part II of this report.

Procedures for Review of Petitions for Recognition

Reviewing petitions for recognition occupies the majority of the Committee's time. The Committee's review procedure is as

follows: An agency presents its petition to the Division of Eligibility and Agency Evaluation three months in advance of the Committee's next meeting. Review of the petition is assigned to one of the Committee's two subcommittees. Copies of the petition are mailed to the subcommittee members, and, providing there are enough available, to the remainder of the Committee. Site visits by Division personnel and/or consultants to the Office of Education are conducted, and the reports from these visits are included among the review materials. The Division staff develops an analysis of the petition based upon the published Criteria for Recognition. This analysis is mailed in advance to Committee members, to the petitioning agency and to interested third parties who have requested a copy of it.

During its meeting, Committee members meet for a time as two separate subcommittees, supported by staff and consultants, review the merits of each petition and hear oral presentations by representatives of the petitioning agencies and by interested third parties who have requested an appearance. Following the presentations, the subcommittees conduct a final review of the petitions and prepare recommendations for the full Committee. The full Committee reviews the subcommittee reports and develops recommendations to the Commissioner. The Commissioner then approves or disapproves the recommendations, and notifies the agency in question of that action. Finally, changes in the lists of recognized agencies are published from time to time in the FEDERAL REGISTER.

Cost to Print this Report

The cost to the United States to print this report was \$3,800.00.

PART I

COMMITTEE ACTIONS REGARDING PETITIONS AND INTERIM REPORTS

For the full text of criteria references cited in the Committee's actions, please see the appropriate appendix:

Criteria for Recognition of National Accrediting Bodies	Appendix II
Criteria for Recognition of State Agencies for the Approval of Public Postsecondary Vocational Education	Appendix III
Criteria for Recognition of State Agencies for the Approval of Nurse Education	Appendix IV
Procedures for a Determination that There is Satisfactory Assurance that Institutions Will Meet Accrediting Standards within a Reasonable Period of Time	Appendix V

Unless otherwise indicated in the text, actions by the Committee were approved by the U.S. Commissioner of Education on the following dates:

January 17-20 Meeting	May 3, 1978
March 15-17 Meeting	May 9, 1978
June 21-23 Meeting	September 20, 1978
November 1-2 Meeting	February 25, 1979
December 12-15 Meeting	March 5, 1979

A. Nationally Recognized Accrediting Agencies and Associations

ACCREDITING COMMISSION ON EDUCATION FOR HEALTH SERVICES ADMINISTRATION

January 17-20, 1978; *Petition for renewal of recognition for accreditation of graduate programs in health services administration.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Commission; DEAE staff analysis of the petition.

Oral presentations before Subcommittee 1 by representatives of the Commission: Charles Austin, Vice Chairman of the Commission, and Dean of the Graduate School, Trinity University; Gary Flierman, Secretary of the Commission.

The Commission demonstrated compliance with all of the Criteria for Recognition except those related to: (1) development of a written policy regarding reinstatement of programs which have lost accreditation; (2) setting forth its policies and procedures regarding "mini-visits" (interim surveys); and (3) updating of its self-survey form to assure participation by all its constituencies, particularly those other than faculty. During their presentation before Subcommittee 1, representatives of the Commission indicated that the Commission already had

begun to resolve these concerns. Recognition was continued for four years, and the Commission was requested to submit to the Advisory Committee, in one year, a report demonstrating that the concerns listed above have been resolved.

AMERICAN ACADEMY OF MICROBIOLOGY, COMMITTEE ON POSTDOCTORAL EDUCATIONAL PROGRAMS

June 21-23, 1978: *Petition for initial recognition for accreditation, and preaccreditation as "Eligibility for Approval," of postdoctoral programs in microbiology.*

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by the agency; DEAE staff analysis of the petition; *Comments on Staff Analysis of Application to Office of Education from the Committee on Postdoctoral Educational Programs, American Academy of Microbiology*, with attachments, submitted by the agency; letter of June 22, 1978, to John R. Proffitt, Director, DEAE, and Vaileau Wilkie, Jr., Acting Chairperson of the Advisory Committee, from Robert F. Acker, Executive Director, American Academy of Microbiology, withdrawing petition and announcing plans for resubmission.

Oral presentations before Subcommittee 1 by representatives of the Committee on Postdoctoral Educational Programs: Marlon M. Brooke, Chairman; Robert F. Acker, Executive Director, American Society for Microbiology; Robert D. Watkins, Public Affairs Officer of the Society.

No action was taken by the Advisory Committee or the Commissioner. After an oral presentation before the Committee, the agency withdrew its petition, announcing that it would submit a new petition at a later date.

AMERICAN ASSEMBLY OF COLLEGIATE SCHOOLS OF BUSINESS, ACCREDITATION COUNCIL

June 21-23, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the report; letter of January 18, 1977, to John R. Proffitt from Allen T. Bonnell, President, Community College of Philadelphia, identifying concerns regarding the Council's accrediting practices.

Following its review by the Advisory Committee in June 1978, the Council was asked to submit, in September 1977, evidence of its compliance with criterion (b)(2)(i), by the appointment of at least two public representatives in capacities that assure attention by policy and decisionmaking bodies. The Council demonstrated compliance by appointing two lay members to its Operations Committee. Although the Council submitted its report on time, the Advisory Committee was unable to review it until June 1978. The report was accepted.

AMERICAN ASSOCIATION FOR MARRIAGE AND FAMILY THERAPY, COMMISSION ON ACCREDITATION FOR MARRIAGE AND FAMILY THERAPY EDUCATION (formerly the AMERICAN ASSOCIATION OF MARRIAGE AND FAMILY COUNSELORS, COMMISSION ON ACCREDITATION)

June 21-23, 1978: *Petition for initial recognition for accreditation of graduate degree programs and clinical training programs in marriage and family counseling.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Association; DEAE staff analysis of the petition; report of USOE consultant panel on marriage and family counselor training, November 15, 1977; letter of May 23, 1978, to the Advisory Committee from Autry Brown, Brentwood Baptist Center, opposing recognition of the Association; letter of June 13, 1978, to John R. Proffitt, from Charles A. Kiesler, Executive Officer, American Psychological Association, opposing recognition of the AAMFC; letter of June 14, 1978, to John R. Proffitt, from Murray Bowen, President, American Family Therapy Association, Inc., suggesting

potentially negative implications and consequences which might result from recognition of AAMFC.

Oral presentations before Subcommittee 1 by representatives of the Committee on Accreditation: William C. Nichols, Jr., Former Chairperson; C. Ray Fowler, Executive Director of the Association; Bernard H. Ehrlich, Consultant to the AAMFT; Steven L. Engelberg, Washington Council for Government Affairs; Mr. Liberman, Former Member of the Board of Directors.

The Committee on Accreditation demonstrated satisfactory compliance with most of the Criteria for Recognition. Recognition was granted for one year. The Committee on Accreditation was requested to demonstrate, when it submits a petition for renewal of recognition in one year, improvement in its compliance with these Criteria: (a)(2)(ii), concerning an apparent lack of adequate administrative support; (b)(5), concerning development of steps to assess the validity and reliability of its accrediting standards in conjunction with a planned review of those standards; and (a)(3)(ii), concerning development of an appropriate relationship of the Committee's preaccreditation procedures to its accreditation procedures. On the basis of the Committee on Accreditation's failure to demonstrate compliance with this criterion, recognition for the preaccreditation category of "Candidates" was denied.

AMERICAN ASSOCIATION OF BIBLE COLLEGES, COMMISSION ON ACCREDITING

November 1-2, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Commission; DEAE staff analysis of the report.

In his letter of June 17, 1978, the Commissioner of Education asked the Commission on Accrediting to submit written confirmation of its oral assurances to the Committee about the com-

position of the Commission's decisionmaking bodies, its appeal process and its procedures for assessing the validity and reliability of its standards. The Commission provided satisfactory confirmation, and the report was accepted.

AMERICAN ASSOCIATION OF NURSE ANESTHETISTS, COUNCIL ON ACCREDITATION OF EDUCATIONAL PROGRAMS OF NURSE ANESTHESIA

January 17-20, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the report; *Comments of the American Society of Anesthesiologists on the Progress Report of the Council on Accreditation of the American Association of Nurse Anesthetists*, December 1, 1977; letter of January 16, 1978, to John R. Proffitt, from Edward L. Kaelits, Executive Staff Secretary, Council on Accreditation, American Association of Nurse Anesthetists, responding to the *Comments of the American Society of Anesthesiologists*; *Oral Presentation by the American Association of Nurse Anesthetists' Council on Accreditation before the Subcommittee of the Advisory Committee on Accreditation and Institutional Eligibility*, January 19, 1978.

Oral presentations before Subcommittee 2 by representatives of the American Society of Anesthesiologists (which charged that anesthesiologists are not represented adequately on the Council on Accreditation): Jack Moyers, President of the Society; Jess Weiss, President-elect; Eli Brown, Chairman, Department of Anesthesiology, Wayne State University.

Oral presentations before Subcommittee 2 by representatives of the Council on Accreditation: Celestine Harrigan, Chairperson; C.R. Steven, Secretary; Mildred Katzell, Psychological Corporation. Also present on behalf of the Council: Edward L. Kaelits, Executive Staff Secretary; Ira P. Gunn, Consultant to the Council and Project Director for the Progress Report.

In his letter of November 14, 1976, the Commissioner of Education requested the Council to submit to the Advisory Committee a report indicating:

- a. progress toward establishment of a program of evaluation of its educational standards designed to assess their validity and reliability—criterion (b)(5) (validity of standards) of the Criteria for Recognition—with the assessment expected to involve appropriate constituencies, including physician educators;
- b. evidence of continued representation in policy and decision-making bodies of the community of interests affected by the Council's accreditation programs—criterion (c)(4) (reflects community of interests);
- c. assurance that the Council performs no functions inconsistent with its ability to make independent judgments of the quality of education programs—criterion (d)(1) (independence of function); and
- d. implications of the Council's requirement for the CRNA certificate as a condition for membership on nurse anesthesia faculties.

The Council responded satisfactorily to these concerns. Nevertheless, concerns remained over charges by representatives of the American Society of Anesthesiologists that anesthesiologists are not represented adequately on the Council. The Council's report, therefore, was accepted, and the Council was encouraged to establish liaison with appropriate bodies interested in the accreditation of nurse anesthesia education schools and programs.

AMERICAN BAR ASSOCIATION, COUNCIL OF THE SECTION OF LEGAL EDUCATION AND ADMISSIONS TO THE BAR

1. January 17-20, 1978: *Petition for renewal of recognition for accreditation of professional schools of law.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Council; DEAE staff analysis of the petition; *Summary of Letters, Reports, and Third-Party Statements Pertaining to the Continued Recognition of the Council of the Section of Legal Education and Admissions to the Bar, American Bar Association*, January 18-20, 1978, prepared by DEAE; letters of September 16 and October 4, 1977, to DEAE from Western State University College of Law, regarding the ABA's position with respect to proprietary law schools; letter of December 12, 1977, to John R. Proffitt from Scott Price, Treasurer, Northeastern Association of Paralegal Educators, on behalf of the National Alliance of Paralegal and Consumer Interests, regarding the Council's petition; *Statement before the Advisory Committee on Accreditation and Institutional Eligibility*, by John W. Black and Maxwell S. Boas of Western State University College of Law, January 19, 1978, with supporting documentation; *Statement on Behalf of the International School of Law Alumni Association in opposition to the Continued Recognition of the American Bar Association as an Accrediting Agency for the United States*, Commissioner of Education, December 2, 1977, with supporting documentation; statement by Jean Camper Cahn and Edgar S. Cahn of Antioch School of Law in support of continued recognition of the Council, January 18, 1978.

Oral presentation before the Committee by representatives of Western State University College of Law, Fullerton, California (which opposed continued recognition of the Council): Burton Reis, Director; Maxwell Boas, Dean, College of Law.

Oral presentations before the Committee by representatives of the International School of Law Alumni Association (which opposed continued recognition of the Council): Charles E. McGee, Senior Partner, McGee and Ketcham, Washington, D.C. Mr. McGee was accompanied by James S.D. Eisenhower III, Attorney, McGee and Ketcham.

Oral presentations before the Committee by representatives of Antioch School of Law (which supported continued recognition of the Council); Jean Camper Cahn and Edgar S. Cahn, Co-Deans.

Oral presentations before the Committee by representatives of the Council: Joseph R. Juilin, Chairman of the Council; Samuel D. Thurman, Chairman-elect of the Council; James P. White, Consultant on Legal Education to the ABA.

The Committee raised a large number of concerns about the Council's compliance with the Criteria for Recognition. The Committee found the Council to be in noncompliance with these criteria: (a)(3)(iii)(B) (guidance to visiting teams); (b)(3)(vii) (notice of right to appeal) and (b)(3)(viii) (appeals rules). The Committee judged the Council to be in potential compliance with these criteria: (a)(2)(i) (administration); (a)(2)(iv) (qualified personnel specifically in (A) visiting teams and (C) policy and decisionmaking bodies); (a)(3)(i) (definitions and procedures); (a)(3)(iii)(A) (involvement of constituencies in the self-study); (b)(1)(i) (consideration of constituencies); (b)(2)(i) (public representatives); (b)(2)(ii)(A) (publication of standards); (b)(2)(ii)(D) (publication of names of personnel); (b)(3) (due process); (b)(3)(iv) (opportunity to comment on team report); (b)(5) (validity and reliability of standards); (b)(6) (evaluation of outputs); (c)(1) (acceptance); and (d) (autonomy).

The Advisory Committee recommended that recognition be continued for one year, and that the Council be requested to submit to the Committee, in six months, a written progress report addressing all of the concerns cited above. In particular, the Committee expected the Council to reassess its view of what constitutes a public representative, and to bring that view into line with the Office of Education Criteria definition of "public representative." The Committee also expected the Council to show progress, within the next six months, toward development of a satisfactory procedure through which an in-

stitution can appeal an adverse decision of the Council or the ABA House of Delegates. The Committee expressed the hope that a proprietary law school of high quality would apply to the Council for accreditation, and that if such a school were to apply, either the Council or the school would invite an Office of Education representative to observe the review.

On March 15, 1978, the Council submitted to the Commissioner a response to the Committee's recommendations. The response disputed the Committee's assessment of the Council's accrediting activities, asserted that the Council is in compliance with all of the Criteria for Recognition, and requested that the Commissioner continue the Council's recognition for four years. The Commissioner also received comments on the Committee's recommendations from the Western State University College of Law of Fullerton, California. The College requested that the Commissioner ask the Council to show cause why it should not be removed from the Commissioner's List of Nationally Recognized Accrediting Agencies and Associations.

Before the Commissioner could act on the Committee's recommendations, the Director of DEAE rescheduled a review by the Advisory Committee of all additional material regarding this petition for the June 21-23, 1978, meeting of the Advisory Committee.

Dr. Harold B. Crosby and Mr. Thomas C. Shearer noted for the record that they are both members of the American Bar Association and their respective State bar associations. After listing their affiliations with the ABA, both announced that they perceived no conflict of interest, and, hearing no objections from the Committee, both participated in the discussion and voting on this petition.

2. June 21-23, 1978: *Consideration of additional materials relevant to the January 1978 petition for renewal of recognition for accreditation of professional schools of law.*

Written materials reviewed by the Committee: memorandum of April 5, 1978, to the Commissioner of Education from the Director of DEAE, with attachments A (excerpts from the Report on Recommendations of the January 1978 meeting), B (letter of March 15, 1978, to the Commissioner from Erwin N. Griswold, Counsel for the ABA, and Joseph R. Julin, Chairman of the ABA Section of Legal Education and Admissions to the Bar), C (DEAE Analysis of the Council's March 15 comments), D (DEAE Analysis, with attachments, of the Council's January petition), E (letter of March 13, 1978, to the Commissioner from Burton Reis, Executive Director, Western State University College of Law, with attached March 13 letter to members of the Advisory Committee) and F (recommendations of the Advisory Committee, DEAE staff, and the Council); letter of April 19, 1978, to the Commissioner from Erwin N. Griswold and Joseph R. Julin; letter of April 26, 1978, to the Commissioner from Burton Reis, with attachment and addendum; letter of May 8, 1978, to the Commissioner from Griswold and Julin; letter of May 11, 1978, to John R. Proffitt from Griswold; letter of June 7, 1978, to Proffitt from James S.D. Eisenhower, III, Chairman, Committee on Accreditation and Legal Education, International School of Law Alumni Association, with attached January 1978 statement of the ABA petition; letter of June 14, 1978, to Proffitt from Reis; letter of June 15, 1978, to Proffitt from Eisenhower; letter of June 19, 1978, to Proffitt from Julin.

Oral presentations before the Committee by representatives of the Council: Joseph R. Julin, Chairman; Samuel D. Thurman, Chairman-elect; James P. White, Consultant on Legal Education to the ABA.

On June 19, 1978, Joseph R. Julin, Chairman of the Section of Legal Education and Admissions to the Bar presented John R. Proffitt with a letter responding point by point to each of the substantive issues raised in the Advisory Committee's January recommendation. Recognizing the very substantial progress reflected in the letter of June 19, 1978, and in the oral presentation made on behalf of the American Bar Association's

Council of the Section of Legal Education and Admissions to the Bar, on June 21, 1978, but also recognizing the need for adequate time to consider such information, (1) the Advisory Committee withdrew the recommendation it had made during its January 1978 meeting, and (2), the Committee scheduled reconsideration of the petition for its September 1978 meeting. Subsequently, the September meeting was postponed, and the review was scheduled for November 1-2, 1978.

Citing past and potential future contractual associations with the American Bar Association, Mrs. Nora Jean Levin did not participate in, or attend, any subcommittee discussions or any voting on this agency. Mrs. Levin attended, but did not participate in, the hearing for the ABA's representatives. Dr. Harold B. Crosby and Mr. Thomas C. Shearer, both members of the ABA and of their respective State bar associations, and both having other relationships with these associations, announced that they perceived no potential conflict of interest, and they participated in all discussions, hearings, and voting on this agency, with concurrence of the other members of the Committee.

3. November 1-2, 1978: *Reconsideration of petition for renewal of recognition for accreditation of professional schools of law.*

Written materials reviewed by the Committee: DEAE staff report on the status of the Council's petition, revised, October 6, 1978; letter of September 29 to John R. Proffitt from Samuel D. Thurman, Chairman of the Council of the Section of Legal Education and Admissions to the Bar (with attachments A—memorandum of September 18, 1978, to Deans of ABA Approved Law Schools from James P. White, Consultant on Legal Education to the ABA; B—June 1978 "Selection of Public Members of the Accreditation Committee;" C—memorandum of April 18, 1978, to Deans of ABA Approved Law Schools from James P. White; and D—memorandum of August 16, 1978, to Deans of ABA Approved Law Schools from James P. White); letter of September 27, 1978, to John R. Proffitt from Burton

Reis, Executive Director, Western State University College of Law, Fullerton, California (with attachments: letter of August 21, 1978, to Samuel D. Thurman from Maxwell S. Boas, Dean, Western State University College of Law; letter of September 21, 1978, to Maxwell S. Boas from James P. White; and memorandum of September 25, 1978, to Deans of ABA Approved Schools from James P. White); letter of June 19, 1978, to John R. Proffitt from Joseph R. Julin, then Chairman of the Council; "Analysis of the Division of Eligibility and Agency Evaluation Regarding the Comments Submitted by the Council of the Section of Legal Education and Admissions to the Bar on March 15, 1978;" letter of March 15, 1978, to the Commissioner of Education from Erwin N. Griswold, Counsel for the ABA and Joseph R. Julin, Chairman of the Council; "Comparative Standards of Free-Standing Law Schools," Report submitted by the Student Bar Association of the San Fernando Valley College of Law (California), November 2, 1978; and letter of November 1, 1978, to John R. Proffitt from Samuel D. Thurman, with attachments.

Oral presentation before the Committee on behalf of San Fernando Valley College of Law faculty (which opposed continued recognition of the Council): John C. Huffer, Professor of Law.

Oral presentation before the Committee on behalf of the Student Bar Association of the San Fernando Valley College of Law (which opposed continued recognition of the Council): Jeffrey A. Hacker, President.

Oral presentations before the Committee by representatives of the Council: Erwin N. Griswold, Counsel for the ABA; James P. White, Consultant on Legal Education to the ABA (Messrs. Griswold and White did not make a presentation, before the Committee, but responded to questions from the Committee).

The Council's letter of June 19, 1978, and subsequent written submissions, as well as its oral presentations in June and

November, were evidence of significant progress toward satisfying the concerns about its compliance with the USOE Criteria for Recognition. The Council demonstrated compliance with all areas of the Criteria except these four: (a)(2)(iv)(A) and (C) (qualified visiting teams and decision-making bodies); (b)(3)(vii) (notice of appeal); (b)(3)(viii) (appeals procedures); and (b)(5) (assessment of validity and reliability of standards). The Council was considered to be in potential compliance with those criteria. Recognition was continued for three years. The Council was requested to submit to the Advisory Committee, in twelve months, a comprehensive report demonstrating compliance with the four areas noted above.

Dr. Harold B. Crosby abstained from all discussion and voting on this petition, on the basis of his recent acceptance of an invitation to teach at a Florida law school. Mrs. Nore Jean Levin abstained from voting on this petition because of a past contractual relationship with the ABA, but did not abstain from the discussions.

AMERICAN COUNCIL ON PHARMACEUTICAL EDUCATION

January 17-20, 1978: 1. *Petition for renewal of recognition for accreditation of professional degree programs in pharmacy.* 2. *Petition for an extension of scope of recognition to include preaccreditation as "Candidate" of professional degree programs in pharmacy.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Council; DEAE staff analysis of the petition.

Oral presentations before Subcommittee 2 by representatives of the Council: Warren Weaver, Member of the Council, and Dean, School of Pharmacy, Virginia Commonwealth University; Daniel A. Nona, Executive Director of the Council.

The Council demonstrated satisfactory compliance with all but three of the Criteria for Recognition, including compliance with all of the criteria pertaining to preaccreditation. During their presentation before Subcommittee 2 of the Committee on January 18, the Council's representatives offered new evidence of compliance with, or indicated a willingness to address concerns about compliance with, the following criteria: (a)(2)(iv) (qualified personnel); (b)(2)(iv) (complaint review procedures); and (c)(4) (reflects community of interests). Recognition was continued for four years, and extension of scope of recognition was granted. The Council was requested to submit to the Advisory Committee, in one year, written confirmation of the oral testimony made by representatives of the Council on January 18, including evidence of full compliance with the criteria noted above. Recognition also was granted for a change in the Council's scope of activities from "professional schools of pharmacy" to "professional degree programs in pharmacy."

AMERICAN DENTAL ASSOCIATION, COMMISSION ON ACCREDITATION OF DENTAL AND DENTAL AUXILIARY PROGRAMS

November 1-2, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Commission; DEAE staff analysis of the report.

Following its review by the Advisory Committee in June 1977, the Commission was requested to submit a report addressing concerns regarding its compliance with criteria (a)(3)(iii)(A) (self-analysis); (b)(4) (ethical practices), specifically, a policy on tuition refunds for programs located in non-regionally accredited institutions; and (b)(3)(viii)(A) (no change in status pending an appeal) and (C) (written decision of the appeal body). The Commission did so, and the report was accepted.

AMERICAN DIETETIC ASSOCIATION, COMMISSION ON EVALUATION OF DIETETIC EDUCATION

November 1-2, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Commission; DEAE staff analysis of the report.

Oral presentation before Subcommittee 1 by a representative of the Commission: Gloria Archer, Coordinator for the Commission.

In his letter of November 5, 1977, the Commissioner of Education asked the Commission to submit a report demonstrating full compliance with the following Criteria for Recognition: (a)(3)(iii)(A) (qualitative assessment); (b)(3)(ii)(C) (information concerning current status); (b)(2)(iv) (Complaint review procedures); (b)(3)(viii)(A) (no change in status pending disposition of appeal); and (b)(3)(viii)(C) (supplying the chief executive officer of the institution with a written decision of the appeal body). The Commission did so, and the report was accepted.

AMERICAN MEDICAL ASSOCIATION, COMMITTEE ON ALLIED HEALTH EDUCATION AND ACCREDITATION

June 21-23, 1978: *Petition for renewal of recognition as a coordinating agency for accreditation of allied health education.*

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by CAHEA; DEAE staff analysis of the petition; *Allied Health Education Fact Sheet*, December 1977, submitted by CAHEA; *Book of Testimony*, submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentation before the Advisory Committee by a representative of the American Hospital Association: Daniel R. Thomas, Staff Specialist, who supported continued recognition of the agency.

Oral presentation before the Advisory Committee by a representative of the American Society for Medical Technology (which opposed continued recognition of the agency): H. Adele Spence, President-elect.

Oral presentations before the Advisory Committee on behalf of the Committee on Allied Health Education and Accreditation (CAHEA): Richard L. Egan, Secretary, Council on Medical Education, AMA; Keith D. Blayney, Member, CAHEA; John E. Beckley, Secretary, CAHEA.

The Committee on Allied Health Education and Accreditation (CAHEA) demonstrated substantial compliance with the Criteria for Recognition which are appropriate to its role as a coordinating agency for accreditation of allied health education. There was insufficient information to judge CAHEA's compliance with criterion (b)(3)(vii)(C), which calls for the accrediting agency to supply the chief executive officer of the institution with a written decision of the appeal body, including a statement of specifics. Also, concerns were raised regarding CAHEA's compliance with criterion (b)(5), which requires an accrediting agency to maintain a program of evaluation of its educational standards designed to assess their validity and reliability. Recognition was continued for four years. CAHEA was requested to submit, at the June 1979 Advisory Committee meeting, a report on its compliance with those two criteria.

AMERICAN MEDICAL ASSOCIATION, COMMITTEE ON ALLIED HEALTH EDUCATION AND ACCREDITATION, IN COOPERATION WITH:

1. AMERICAN ASSOCIATION OF BLOOD BANKS, SUBCOMMITTEE ON ACCREDITATION

June 21-23, 1978: 1. *Petition for renewal of recognition for accreditation of educational programs for the specialist in blood bank technology.* 2. *Petition for initial recognition for the award of the preaccreditation status of "Pending for Accreditation."*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the agency; DEAE staff analysis of the petition; Book of Testimony, submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 1 on behalf of the agency: Charles McClinton, Assistant Director, Department of Allied Health Evaluation, AMA; Alfred J. Grindon, Chairman, Committee on Education, American Association of Blood Banks; Charles H. Wallas, Chairman, Subcommittee on Accreditation, AABB.

The agency demonstrated satisfactory compliance with most of the Criteria for Recognition. The Advisory Committee raised concerns about the agency's compliance with the following criteria:

(a)(2)(iv), on-site evaluation teams frequently consist only of members of the Subcommittee on Accreditation;

(a)(3)(i), there is insufficient published information about the policy and decision-making process—e.g., there is no accreditation manual or other comprehensive policy document; and

(a)(3)(iii)(B), the self-study outline is very brief and there is no evidence that the agency encourages participation in the self-study of the required constituencies. While a manual for onsite visitors is being prepared, none now exists.

Furthermore, the Advisory Committee found that the agency fails to comply with criterion (a)(3)(ii), which requires that the award of preaccreditation status involve the application of criteria and procedures that are related in an appropriate manner to those employed for accreditation. Therefore, recognition was continued for two years. The agency was requested to submit to the Advisory Committee, in one year, a report on the concerns listed above. Recognition for the agency's preaccreditation activities was denied.

2. AMERICAN MEDICAL RECORD ASSOCIATION, EDUCATION AND REGISTRATION COMMITTEE

June 21-23, 1978: *Petition for renewal of recognition for accreditation of educational programs for the medical record administrator and medical record technician.*

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by the agency; DEAE staff analysis of the petition; *Book of Testimony* submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 2 by representatives of the agency: Charles McClinton, Assistant Director, Department of Allied Health Evaluation, AMA; Sandra O. Bailey, Chairman, Education and Registration Committee, American Medical Record Association; Laura Anne Biglow, Director, Academic Department, AMRA.

The agency demonstrated compliance with all but one of the Criteria for Recognition—criterion (b)(6), since it needs to develop a program for assessing the validity and reliability of its accrediting standards. Recognition was continued for four years. The agency was requested to submit to the Advisory Committee, in one year, a progress report demonstrating steps it has taken to comply with that criterion.

3. AMERICAN OCCUPATIONAL THERAPY ASSOCIATION, ACCREDITATION COMMITTEE

June 21-23, 1978: *Petition for renewal of recognition for accreditation of educational programs for the occupational therapist.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the agency; DEAE staff analysis of the petition; *Clarification and Comments* on the DEAE staff analysis, submitted by the Association, June 16, 1978; *Accreditation/Approval Process*, Chart revised April 1978, and submitted by the Association; *Book of Testimony* submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 2 by representatives of the agency: B. Kay Boles, Assistant Director, Department of Allied Health Evaluation, AMA; Elizabeth B. Devereaux, Chairman, Accreditation Committee, American Occupational Therapy Association; Martha Y. Ward, Accreditation Coordinator, AOTA.

The agency demonstrated compliance with all but one of the Criteria for Recognition. Regarding criterion (b)(6) (evaluation of outputs), the American Occupational Therapy Association itself collects data regarding the performance of graduates on the certification examination, but there is no written requirement that programs assess their own outputs in relation to their educational objectives. In addition, there was concern that the traditional method of evaluation of outputs, based upon credentialing records, may no longer be sufficient. Recognition was continued for four years. The agency was requested to submit to the Advisory Committee, in one year, a report demonstrating progress in meeting criterion (b)(6). The agency also was requested to share with the Advisory Committee, when it submits its interim report, a report on the status of its activities in-

volving the assessment of the validity and reliability of its standards. The agency's experience in this area may be useful to the Advisory Committee and to accrediting agencies having difficulty in complying with criterion (b)(5).

4. AMERICAN SOCIETY OF CYTOLOGY, CYTOTECHNOLOGY PROGRAMS REVIEW COMMITTEE

June 21-23, 1978: *Petition for renewal of recognition for accreditation of educational programs for the cytotechnologist.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Review Committee; DEAE staff analysis of the petition; *Book of Testimony* submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 1 by representatives of the agency: John E. Beckley, Secretary, CAHEA; Ann H. Clark, Cytotechnology Programs Review Committee; William J. Frable, Chairman, Cytotechnology Programs Review Committee.

The agency demonstrated substantial compliance with the Criteria for Recognition. Recognition was continued for four years. Because of certain concerns which were raised during the review of this agency, it was asked to strengthen its self-study guide by emphasizing qualitative assessment; to develop a document showing the Review Committee's operating policies, particularly the Review Committee structure and election process, and policies and procedures which modify or supplement the basic CAHEA policies and procedures used by the Review Committee; and to clarify or strengthen its practices relative to the prevention of conflict of interest situations.

5. JOINT REVIEW COMMITTEE FOR RESPIRATORY THERAPY EDUCATION, WHICH IS SPONSORED BY THE AMERICAN ASSOCIATION OF RESPIRATORY THERAPY, AMERICAN COLLEGE OF CHEST PHYSICIANS, AMERICAN SOCIETY OF ANESTHESIOLOGISTS AND THE AMERICAN THORACIC SOCIETY

June 21-23, 1978: *Petition for renewal of recognition for accreditation of educational programs for the respiratory therapist and respiratory therapy technician.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Joint Review Committee; DEAE staff analysis of the petition; *Clarification and Comments* on the Joint Review Committee; *Book of Testimony* submitted by CAHEA and eleven review committees.

Oral presentations before Subcommittee 2 by representatives of the agency: B. Kay Boles, Assistant Director, Department of Allied Health Evaluation, AMA; Larry R. Ellis, Joint Review Committee for Respiratory Therapy Education; Philip A. Von der Heydt, Executive Director of the Joint Review Committee.

The agency demonstrated compliance with most of the Criteria for Recognition. However, regarding criterion (a)(2)(iv), there was a need for a clear statement indicating that the Review Committee selects persons to: serve on evaluation teams; engage in consultative services; and serve on policy and decisionmaking bodies, in accordance with non-discriminatory practices. While the Joint Review Committee insists on adherence to non-discriminatory practices, there is no assurance that the sponsoring agencies which select representatives on the Joint Review Committee do so in a nondiscriminatory manner. Also, regarding criterion (a)(3)(iii)(A), there was no evidence that the self-analysis study document

specifically requests program administrators to assess program strengths and limitations. Recognition was continued for four years. The Joint Review Committee was requested to submit to the Advisory Committee, in one year, a report addressing the above concerns.

6. JOINT REVIEW COMMITTEE ON EDUCATIONAL PROGRAMS FOR PHYSICIAN'S ASSISTANTS, WHICH IS SPONSORED BY THE AMERICAN ACADEMY OF FAMILY PHYSICIANS, AMERICAN ACADEMY OF PEDIATRICS, AMERICAN ACADEMY OF PHYSICIAN'S ASSISTANTS, AMERICAN COLLEGE OF PHYSICIANS, AMERICAN COLLEGE OF SURGEONS AND THE AMERICAN SOCIETY OF INTERNAL MEDICINE

June 21-23, 1978: Petition for renewal of recognition for accreditation of educational programs for the assistant to the primary care physician and the surgeon's assistant.

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by the Joint Review Committee; DEAE staff analysis of the petition; *Book of Testimony* submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 2 by representatives of the agency: L.M. Delmer, Assistant Director, Department of Allied Health Evaluation, AMA; Gayle Spears, Vice Chairman, Joint Review Committee on Educational Programs for Physician's Assistants.

The agency demonstrated satisfactory compliance with all of the Criteria for Recognition except criterion (b)(5). Regarding this criterion, the agency has no formal program for, nor systematic approach to, assessment of the validity and reliability of standards. Recognition was continued for four years. The agency was requested to

submit to the Advisory Committee, in one year, a report on progress made toward meeting criterion (b)(5).

7. JOINT REVIEW COMMITTEE ON EDUCATIONAL PROGRAMS IN NUCLEAR MEDICINE TECHNOLOGY, WHICH IS SPONSORED BY THE AMERICAN COLLEGE OF RADIOLOGY, AMERICAN SOCIETY FOR MEDICAL TECHNOLOGY, AMERICAN SOCIETY OF CLINICAL PATHOLOGISTS, AMERICAN SOCIETY OF RADIOLOGIC TECHNOLOGISTS AND THE SOCIETY OF NUCLEAR MEDICINE

June 21-23, 1978: Petition for renewal of recognition for accreditation of educational programs for the nuclear medicine technologist.

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Joint Review Committee; DEAE staff analysis of the petition; *Book of Testimony* submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 1 by representatives of the agency: Warren G. Bell, Assistant Director, Department of Allied Health Evaluation, AMA; Elaine J. Cuklanz, Secretary/Treasurer, Joint Review Committee on Educational Programs for Nuclear Medicine Technology; Glen Isserstedt, Vice Chairmen of the Joint Review Committee.

The agency demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

8. JOINT REVIEW COMMITTEE ON EDUCATION FOR THE SURGICAL TECHNOLOGIST, WHICH IS SPONSORED BY THE AMERICAN COLLEGE OF SURGEONS, AMERICAN HOSPITAL ASSOCIATION AND THE ASSOCIATION OF SURGICAL TECHNOLOGISTS

June 21-23, 1978: *Petition for initial recognition for accreditation of educational programs for the surgical technologist.*

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by the agency; DEAE staff analysis of the petition; *Book of Testimony*, submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 1 by representatives of the agency: L.M. Detmer, Assistant Director, Department of Allied Health Evaluation, AMA; Elizabeth Battle, Joint Review Committee on Education for the Surgical Technologist; Edward W. Weimer, Chairman of the Joint Review Committee.

The agency demonstrated compliance with most of the Criteria for Recognition. Concerns were raised regarding the agency's compliance with the following criteria: (a)(1)(i), the need for the Joint Review Committee to define, in its evaluation literature, the geographic area covered by its scope of operations; (a)(2)(i), apparent inadequate administrative support for the number of programs covered; (a)(3)(iii)(A), the need for a more appropriate self-study guide for surgical technologist programs; and (b)(5), the need for a more formalized and definitive program of evaluation to assess the validity and reliability of the Committee's accrediting standards. Recognition was granted for two years. The agency was requested to submit to the Division of Eligibility and Agency Evaluation, in one year, a report on its progress toward meeting the criteria cited above.

9. JOINT REVIEW COMMITTEE ON EDUCATION IN RADIOLOGIC TECHNOLOGY, WHICH IS SPONSORED BY THE AMERICAN COLLEGE OF RADIOLOGY AND THE AMERICAN SOCIETY OF RADIOLOGIC TECHNOLOGISTS

June 21-23, 1978: *Petition for renewal of recognition for accreditation of educational programs for the radiographer and radiation therapy technologist.*

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by the Joint Review Committee; DEAE staff analysis of the petition; *JRC Bulletin*, October-December 1977; *Book of Testimony* submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 1 by representatives of the agency: Warren G. Ball, Assistant Director, Department of Allied Health Evaluation, AMA; Polly Story, Former Chairman, Joint Review Committee on Education in Radiologic Technology; Robert L. Coyle, Executive Director of the Joint Review Committee.

The agency demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

10. NATIONAL ACCREDITING AGENCY FOR CLINICAL LABORATORY SCIENCES, WHICH IS SPONSORED BY THE AMERICAN SOCIETY FOR MEDICAL TECHNOLOGY AND THE AMERICAN SOCIETY OF CLINICAL PATHOLOGISTS

June 21-23, 1978: *Petition for renewal of recognition for accreditation of educational programs for the medical technologist, associate degree and certificate programs for the medical laboratory technician and educational programs for the histologic technician.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Agency; DEAE staff analysis of the petition; Tables I through VII: *Scope of Activity, Education/Training Preparation, Organizational Relationships, Organizational Chart for*

NAACLS Office, Accreditation Review Process Status, Steps in the Initial Application Process, Steps in the Application of Renewal of Accreditation Process, all submitted by the Agency; Book of Testimony, submitted by CAHEA and eleven review committees, June 22, 1978.

Oral presentations before Subcommittee 1 by representatives of the agency: Robert B. Parks, Assistant Director, Department of Allied Health Evaluation, AMA; Ruth M. French, Chairman, Review Board, National Accrediting Agency for Clinical Laboratory Sciences; Jerome Benson, Vice Chairman, Review Board, NAACLS; Carol M. Elkins, Executive Director, NAACLS; Diane Frometz, Assistant Director, NAACLS.

The agency demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

11. REVIEW COMMITTEE FOR PHYSICAL THERAPY EDUCATION, WHICH IS SPONSORED BY THE AMERICAN MEDICAL ASSOCIATION

1. June 21-23, 1978: *Petition for renewal of recognition for accreditation of professional programs for the physical therapist.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Review Committee; DEAE staff analysis of the petition; CAHEA Response to Staff Analysis; Book of Testimony submitted by CAHEA and eleven review committees, June 22, 1978; Testimony in Support of Recognition of the Committee on Allied Health Education and Accreditation for Physical Therapy Program Accreditation by the Advisory Committee to the Commissioner of Education of the Office of Education, Department of Health, Education, and Welfare, by Daniel R. Thomas, Staff Associate, American Hospital Association, June 22, 1978. Mr. Thomas's written and

oral testimony were delivered on behalf of the American Hospital Association. Later in the meeting, Mr. Thomas stated for the record that the testimony was meant to support generally the concept of "umbrella" accreditation in allied health education, and not any specific petitioning agency. Reference to Mr. Thomas's oral presentation, therefore, is found under the CAHEA petition for recognition as a coordinating agency.

Oral presentations before the Committee by representatives of the American Physical Therapy Association (which opposed continued recognition of the agency): William Holmes, Member, Committee on Accreditation, American Physical Therapy Association, and President, Simmons College, Boston; Edward Eckenhoff, Member, Committee on Accreditation, APTA, and Vice President, Rehabilitation Institute, Chicago; Sven Eliasson, Member, Committee on Accreditation, APTA, and Professor of Neurology, Washington University, St. Louis; Patricia Yarbrough, Director, Physical Therapy Programs, Georgia State University, Atlanta; Patricia R. Evans, Director, Department of Educational Affairs, APTA.

Oral presentations before the Committee on behalf of the agency: Benjamin T. Cullen, Chairman, Review Committee for Physical Therapy Education; Nathaniel Shipp, Member, Review Committee; Richard Madison, Member, Review Committee; William Smith, Member, AMA Legal Staff; Keith D. Blayney, Chairman, CAHEA; Irene Krauss, President, Providence Hospital, Washington, D.C.; John E. Beckley, Secretary, CAHEA, and Director, Department of Allied Health Evaluation, AMA; B. Kaye Boles, Assistant Director, Department of Allied Health Evaluation, AMA; Robert B. Parks, Assistant Director, Department of Allied Health Evaluation, AMA; Lynn Fringer, Group Vice President, AMA; Richard L. Egan, Secretary, Council on Medical Education, and Director, Division of Educational Standards, AMA.

On January 1, 1977, a collaborative arrangement between the American Physical Therapy Association (APTA) and the Council on Medical Education, American Medical Association, was dissolved at the instigation of the APTA, which was dissatisfied with its role in the arrangement. The American Medical Association (AMA) restructured its accrediting operation in physical therapy education, creating the agency represented by this petition. On August 1, 1977, the Commissioner of Education recognized APTA for accreditation in this field on the basis of its more established and stronger accreditation program. At the same time, the Commissioner recognized the Committee on Allied Health Education and Accreditation (CAHEA), American Medical Association, in cooperation with the Review Committee for Physical Therapy Education, for accreditation in the same field. In a status report and oral presentation to the Advisory Committee, the agency had offered evidence of compliance, or potential compliance, with the Criteria for Recognition, and the Commissioner had hoped that recognition of both agencies would stimulate them to work together to resolve their differences.

During this meeting, the Advisory Committee found that certain significant policies and procedures of the agency were still in the developmental stage. It also found that the agency's compliance with a significant number of the Criteria was questionable because its record of reviews during its initial period of operation was extremely limited. These areas were: (a)(1)(i) (scope), (a)(3)(iii)(A) (qualitative assessment), (a)(3)(iii)(B) (guidance), (b)(3)(vi) (withdrawal of accreditation), (b)(4) (fosters ethical practices), (b)(7) (encourages innovation), (b)(8) (adheres to criteria/renders impartial judgments) and (b)(9) (reevaluates). The agency was judged to be in potential compliance with criterion (d)(2), because of the consultative function supplied by the agency's visiting team in at least one instance. The agency did not demonstrate compliance with the following criteria:

(c)(1) (acceptance), because there was a lack of acceptance of the accreditation program by professional educators and practitioners;

(c)(4) (reflects community of interests), concerning policy-making (i.e., the formulation of standards), because there was no structure which permitted representation from the physical therapy community; and

(b)(5) (validity and reliability), because there was no program of assessment of the validity and reliability of standards.

The agency was requested to show cause, at the December 1978 Advisory Committee meeting, why the Commissioner's recognition should not be withdrawn. During its December meeting, the Advisory Committee also was to give further consideration to concerns about the autonomy of the present accreditation arrangement for physical therapy. The current arrangement was sponsored, and solely managed, by a profession other than that whose educational program was being evaluated.

Dr. Anne Pascasio, Dean of the School of Health Related Professions at the University of Pittsburgh, and a physical therapist by profession, declined to participate or be present during any of the discussions, hearings, and voting on this petition. She announced that while she herself felt no conflict existed, she desired to avoid the appearance of any potential conflict of interest.

2. December 12-15, 1978: *Response to request to show cause why the Commissioner's recognition for accreditation of professional programs for the physical therapist should not be withdrawn.*

Written materials reviewed by the Advisory Committee: (1) submitted by the petitioning agency: response of December 1, 1978, to the Commissioner's request; (2)

submitted by the American Physical Therapy Association: statement submitted on December 14, 1978; (3) submitted by DEAE: DEAE staff analysis of the agency's June petition; DEAE staff analysis of the agency's response to the Commissioner's request; letter of August 4, 1978, to the Commissioner from William B. Smith, Director, AMA Department of Membership Legal Affairs; letter of September 14, 1978, to William B. Smith from the Commissioner; series of correspondence between John R. Proffitt and John E. Beckley, Secretary, Committee on Allied Health Education and Accreditation, AMA (letters of November 2, 13, 21 and 28, 1978).

Oral presentations before the Advisory Committee on behalf of the American Physical Therapy Association (which opposed continued recognition): James Clinkingbeard, Director for Educational Affairs; William Holmes, President of Simmons College; Douglas Westrem, member of the Committee on Accreditation and a private physical therapy practitioner.

Oral presentation before the Advisory Committee on behalf of the National Association of Physical Therapists, Inc. (which supported continued recognition): John T. Mustari, President.

Oral presentation before the Advisory Committee on behalf of the United States Physical Therapy Association (which supported continued recognition): James Babcock, Secretary, and Director of Physical Therapy, South Shore Hospital, Chicago.

Oral presentations before the Advisory Committee on behalf of CAHEA and the Review Committee: Keith D. Blayney, Chairman, CAHEA, and Dean, School of Public and Allied Health, University of Alabama at Birmingham; C.H. William Ruhe, Senior Vice President, AMA; Benjamin T. Cullen, Jr., Chairman, Review Committee for Physical

Therapy Education, and Associate Dean, School of Allied Health Professions, Virginia Commonwealth University; John E. Beckley, Director, Department of Allied Health Evaluation, AMA; Robert B. Perks, Assistant Director, Department of Allied Health Evaluation, AMA.

Of the eight areas of questionable compliance with the Criteria for Recognition cited during its last review, the agency was able to demonstrate full compliance with six of the criteria, and potential compliance with two—criteria (b)(8) and (b)(9). The agency also demonstrated compliance with criterion (d)(2). However, of the three areas of non-compliance cited in June, the agency still failed to demonstrate compliance with criteria (c)(1) and (c)(4). In addition, the agency also was judged to be in non-compliance with criterion (d)(1), because the absence of adequate representation by members of the physical therapy profession indicated the loss of an important balancing factor between the interests of the medical profession and the interests of the physical therapy profession.

In attempting to develop a recommendation to the Commissioner on appropriate action to be taken, the Advisory Committee considered, and rejected, several alternatives. These included a recommendation to continue recognition until the following June (1979), with a full-dress review of the agency by the Advisory Committee at that time; and a recommendation to continue recognition for a full year, with a request for a progress report in six months on the issues of concern cited above. Proponents of these recommendations argued that the agency had made substantial improvements which had contributed to a change in its attitude; that the agency had not had sufficient time in which to develop an independent accrediting program which could satisfy all of the Commissioner's criteria; and that the appearance of two physical therapy groups in support of the agency indicated some degree

of participation and acceptance by physical therapists. The minority also hoped that adoption of one of its recommendations would serve to inform the agency of the Commissioner's grave concern over its failure to demonstrate satisfactory compliance with important criteria, while still permitting the agency additional time to correct its deficiencies.

Ultimately, however, the agency was judged to have failed to show cause why it should not be removed from the Commissioner's List of Nationally Recognized Accrediting Agencies and Associations. The Advisory Committee concluded that the agency's failure to comply with criteria (c)(1), (c)(4) and (d)(1) was too serious to justify continued recognition. The Committee was particularly concerned that this noncompliance was related to the agency's failure to demonstrate adequate input by physical therapists in its accreditation of physical therapy education. The Committee also noted that withdrawal of recognition would not adversely affect eligibility of physical therapy education programs, because of their access to another nationally recognized accrediting agency in the field (the American Physical Therapy Association). Recognition, therefore, was withdrawn. In withdrawing recognition, however, the Commissioner afforded the agency a further hearing before the Advisory Committee before making his decision final. The results of that hearing will be reported in the 1979 annual report of the Advisory Committee.

Dr. Barbara H. Knudson abstained from voting on this matter because she had, in her former capacity as a consultant to the Office of Education, observed a site visit to Dean Blayney's institution.

AMERICAN MONTESSORI SOCIETY, BOARD OF DIRECTORS

January 17-20, 1978: *Petition for initial recognition for accreditation of early childhood teacher training programs.*

Written materials reviewed by the Committee: petition and supporting documentation prepared by the Society; DEAE staff analysis of the petition; *American Montessori Society as an Accrediting Agency: Statement in Opposition by National Center for Montessori Education*, January 18, 1978; *Remarks before Subcommittee 2 of the Advisory Committee on Accreditation and Institutional Eligibility*, January 19, 1978, submitted by the Association Montessori Internationale-USA (AMI-USA); AMI-USA News, Autumn 1977, submitted by AMI-USA.

Oral Presentations before Subcommittee 2 on behalf of the National Center for Montessori Education: Lee Havis, Administrator; Charles Plath, President, Montessori Institute of America, and Member, Missouri Montessori Association; Mary Lefever, St. Nicholas Training Center; Sister Teresita Poulin, Missouri Montessori Association; Lillian Dilg, Upper Darby, Pennsylvania; and Jane Dutcher, Director of Montessori Studies, Lausanna School, Memphis, Tennessee.

Oral presentations before Subcommittee 2 on behalf of the Association Montessori Internationale-USA: Jon R. Osterkorn, Penfield Children's Center, Milwaukee, Wisconsin; Karin Salzmann, National Coordinator, AMI-USA, New Canaan, Connecticut; Elizabeth Hall, Washington Montessori Institute, Washington, D.C.; Jean K. Miller, Secretary, North American Montessori Teachers Association, Cleveland, Ohio.

Oral presentations before Subcommittee 2 by representatives of the Board of Directors, American Montessori Society: John Petri, Board Member, AMS, and Research Associate, Bureau of Education Research, Memphis State University; Elene Glassman, Counsel, AMS; Marcella Dawson, Chairman, Teacher Training Committee, AMS. Also present was Cleo Monson, National Director, AMS.

Following review of the written material and oral presentations by various Montessori education groups, the Board requested deferral of action on its petition. This was done, with the

stipulation that reconsideration of the petition could not be scheduled earlier than the September 1978 Advisory Committee meeting, because of the Committee's heavy schedule. (No petition was submitted during the remainder of 1978). The Board was urged to assume the initiative in convening a meeting of interested parties including, but not limited to, those represented at the January 1978 Advisory Committee meeting. The various groups which attended the meeting had indicated a willingness to work together in a joint accreditation effort, although the speakers for the National Center for Montessori Education and the Association Montessori Internationale-USA had opposed recognition of the American Montessori Society alone. The Division of Eligibility and Agency Evaluation was directed to provide a staff person to meet with the interested parties in order to help clarify the Office of Education's concerns in this area, and to serve as a catalyst in stimulating an open and honest discussion of a broader-based accreditation thrust.

AMERICAN OPTOMETRIC ASSOCIATION, COUNCIL ON OPTOMETRIC EDUCATION

March 15-17, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the materials submitted by the Council.

Following its review in December 1976, the Council was asked to respond to concerns related to the need for inclusion in its evaluation literature of a statement regarding the Council's geographic scope of activities; the need for inclusion of a statement assuring the accreditation status of an institution pending disposition of an appeal; the need for revision of its accreditation-related materials to reflect equal and impartial treatment of all applications for accreditation; and the need to

add another public representative at the policy and decision-making level. The Council's report satisfied the first three concerns, and the Council assured the Advisory Committee that it had amended its by-laws to permit the addition of another public member to the Council. The amendment required ratification by the Association's House of Delegates, and was scheduled for consideration by the House in July 1978. In the interim, the Council stated that it was taking steps to appoint, as a consultant, a representative of the public who "will have the same input into the deliberative processes of the Council as the Council members themselves." The report, therefore, was accepted, and the Council was requested to report to the Division of Eligibility and Agency Evaluation, before the September 1978 Advisory Committee meeting, on the official action taken by the House of Delegates regarding appointment of a second public representative to the Council.

AMERICAN PODIATRY ASSOCIATION, COUNCIL ON PODIATRY EDUCATION

November 1-2, 1978: *Petition for renewal of recognition for accreditation, and the award of the preaccreditation statuses of "Reasonable Assurance" and "Preliminary Accreditation," of colleges of podiatric medicine, including first professional degree and graduate degree programs in podiatry.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Council; DEAE staff analysis of the petition.

Oral presentations before Subcommittee 2 by representatives of the Council: John L. Bennett, Director of the Council; John Taylor, Consultant to the Council.

The Council demonstrated satisfactory compliance with most of the Criteria for Recognition. Concerns were identified with the following issues: (1) compliance with the "public representatives" criterion—(b)(2)(i); (2) the heavy involvement of

Council members in the accreditation process; (3) adequate policies and procedures for prevention of conflicts of interest in the process; and (4) development of guidelines for the nomination of persons to the Council and limits to the number of terms for Council members. In submitting its petition, the Council requested that the Commissioner withdraw his recognition of its accreditation of podiatric assistance programs, since there is only one such program, and its accreditation serves no Federal eligibility purpose. Recognition was continued for three years. Recognition for accreditation of podiatric assistant programs was withdrawn. The Council was requested to submit to the Advisory Committee, in one year, a report addressing the concerns noted above.

AMERICAN PSYCHOLOGICAL ASSOCIATION, COMMITTEE ON ACCREDITATION

January 17-20, 1978: *Interim report on accreditation of doctoral programs in school psychology.*

Written materials reviewed by the Advisory Committee: report and supporting documentation submitted by the Committee on Accreditation; DEAE staff analysis of the report.

Oral presentation before Subcommittee 1 by a representative of the Committee on Accreditation: Carolyn Jackson, Director, Office of Accreditation, APA.

Following its review in March 1977, the Committee on Accreditation was asked to submit a report on its selection process for evaluating team members and its compliance with the self-study criterion, (a)(iii)(A), of the Criteria for Recognition. The report also was expected to demonstrate progress toward resolution of the jurisdictional dispute between the American Psychological Association and the National Council for Accreditation of Teacher Education. The Committee on Accreditation's report revealed that:

—The Committee on Accreditation was undertaking a review of its evaluation team selection process and was considering the direct appointment of a larger proportion of the on-site evaluation team membership. However, it did not document or demonstrate any change in the actual selection process.

—The Committee on Accreditation did not produce any documentation which would eliminate the Office of Education's concern, as expressed in the last petition review, about the absence of an assessment by the program under review of its strengths and limitations.

—There appeared to be little substantive change from 1975 to 1977 relative to the resolution of the Association's jurisdictional dispute with the National Council for Accreditation of Teacher Education, though some informal progress was made.

The report was accepted, and recognition was continued until March 1979, when the Advisory Committee was scheduled to review the Committee on Accreditation's other accrediting activities. The Committee on Accreditation was requested to address specifically the concerns noted above if it chose to submit a petition for renewal of recognition in March.

AMERICAN SPEECH AND HEARING ASSOCIATION, AMERICAN BOARDS OF EXAMINERS IN SPEECH PATHOLOGY AND AUDIOLOGY

January 17-20, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Boards; DEAE staff analysis of the report.

Oral presentation before Subcommittee 1 by a representative of the agency: Frederick T. Spahr, Deputy Executive Secretary of the Association.

In November 1976, the Commissioner requested the Boards to submit a report on their compliance with the following Criteria for Recognition:

(a)(2)(i), representatives of the public in policy and decision-making bodies, or in an advisory or consultative capacity that assures attention by the policy and decisionmaking bodies;

(b)(2)(iv), adoption of written complaint review procedures;

(a)(3)(iii)(B), adoption of revised self-study guidelines and visiting team instructions; and

adoption of proposed new accreditation procedures.

The Boards satisfied two of these concerns, and demonstrated potential compliance with criteria (b)(2)(iv) and (a)(3)(iii)(B). The report was accepted, and the Boards were requested to submit to the Division of Eligibility and Agency Evaluation, within six months, evidence that these two remaining concerns were resolved.

AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS, LANDSCAPE ARCHITECTURAL ACCREDITATION BOARD

December 12-15, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Board; DEAE staff analysis of the report.

Following its review in March 1977, the Commissioner requested the Board to submit a report on its progress in implementing its new accreditation program. The Board submitted its report, and it was satisfactory. The report was accepted.

AMERICAN VETERINARY MEDICAL ASSOCIATION, COMMITTEE ON ANIMAL TECHNICIAN ACTIVITIES AND TRAINING

March 15-17, 1978: *Petition for renewal of recognition for accreditation of associate degree programs for animal technicians.*

Written materials reviewed by the Committee: Petition and supporting documentation submitted by CATAT; DEAE staff analysis of materials submitted by CATAT; Memorandum to John R. Proffitt from Eugene I. Van Antwerp, consultant to the Office of Education, regarding the semi-annual meeting of CATAT.

Oral presentation before Subcommittee 2 by a representative of the agency: R. Leland West, Director of Scientific Activities, American Veterinary Medical Association.

The Committee on Animal Technician Activities and Training (CATAT) demonstrated satisfactory compliance with the Criteria for Recognition. However, concerns were raised about the fact that CATAT's public representatives were selected from an area near the staff headquarters, creating a potential appearance of inappropriate connections between Association staff and lay representatives. Recognition was continued for four years, and CATAT was asked to examine the narrow geographic representation of its public representatives.

ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS, ACCREDITING COMMISSION

June 21-23, 1978: *Petition for an extension of scope of recognition to include institutional accreditation of private, postsecondary degree and nondegree granting institutions that are predominantly organized to train students for business careers.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Commission; DEAE staff analysis of the petition; *Statement by Mrs. Jan V. Eisenhower, Chairman, Accrediting Commission, AICS, before the U.S. Commissioner's Advisory Committee in Support of Application for Recognition of the Institutional Accreditation*

Granted by the Accrediting Commission, Association of Independent Colleges and Schools, June 21, 1978.

Oral presentations before Subcommittee 1 by representatives of the Commission: Jan Eisenhower, Chairman; Richard Fulton, General Counsel; Robert M. Toren, Executive Secretary.

The Commission demonstrated satisfactory compliance with most of the Criteria for Recognition pertaining to requests for an extension of scope of recognition. However, the Committee found that it needs more specific information about issues raised by the staff than it was able to obtain during the oral presentation by representatives of the Commission. Therefore, extension of scope of recognition was granted until the next scheduled review of the Commission in June 1979. The Commission was requested to provide, during that review, the following: (1) more information about the scope and nature of the Commission's "nonbusiness education universe"—criterion (a)(1)(i); (2) further explanation about the rationale behind the Commission's move toward use of the broad, indefinite term "predominantly" to replace the use of numerical standards (e.g., the percentage of student enrollment in business programs) in defining institutional eligibility to apply for accreditation—criterion (a)(1)(ii); and (3) specific information about the membership of the Commission relative to representation from accredited institutions having non-business offerings—criteria (a)(2)(iv)(C) and (c)(4).

COSMETOLOGY ACCREDITING COMMISSION

January 17-20, 1978: Petition for renewal of recognition for accreditation of cosmetology schools and programs.

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Commission; DEAE staff analysis of the petition; *Statement of the National Hairdressers and Cosmetologists Association Concerning the Accreditation of the Cosmetology Accrediting Commission*, by Lauren Oldak, January 19, 1978.

Oral presentation before Subcommittee 1 by a representative of the National Hairdressers and Cosmetologists Association: Lauren Oldak, Counsel.

Oral presentations before Subcommittee 1 by representatives of the Commission: James R. Dunne, Executive Director; Bernard H. Enrilch, Counsel.

The Advisory Committee raised serious concerns about the Commission's compliance with a number of the Criteria for Recognition. Representatives of the Commission, at the meeting, expressed sensitivity and responsiveness to these concerns. The Commission was found to be in noncompliance with the following criteria: (a)(1)(ii) (definition of scope), (b)(10) (accurate reference), (b)(5) (validity and reliability), and (d)(1) (autonomy). The Commission was judged to be in potential compliance with the following criteria: (a)(2)(ii) (finances), (a)(3)(iii)(A) (self-study), (b)(3)(iii) (furnishes report) and (b)(8) (adheres to criteria/renders impartial judgments). Recognition was continued for one year. The Commission was requested to address all of the concerns above when it submits its petition for renewal of recognition in one year.

COUNCIL FOR NON-COLLEGIATE CONTINUING EDUCATION, ACCREDITING COMMISSION (formerly the CONTINUING EDUCATION COUNCIL, ACCREDITING COMMISSION)

1. January 17-20, 1978: Petition for initial recognition for accreditation of programs in the continuing education field.

Written materials review by the Committee: petition and supporting documentation submitted by the Council; DEAE staff analysis of the petition; *Remarks of Homer Kempfer, Executive Director of the Council, before the Advisory Committee on Accreditation and Institutional Eligibility, January 18, 1978.*

Oral presentation before Subcommittee 1 by a representative of the Commission: Homer Kempfer, Executive Director.

The Commission failed to demonstrate that it serves clearly identified needs which would not be met by other accrediting agencies recognized by the Commissioner—criterion (b)(1) of the Criteria for Recognition. Further, the Commission failed to demonstrate a clear definition of its scope of operations—criterion (a)(i)(ii). Recognition was denied. Before he allowed his decision to become final, however, the Commissioner afforded the Commission an opportunity to have an additional hearing before the Advisory Committee in June 1978.

2. June 21-23, 1978: *Response to denial of petition for initial recognition for accreditation of programs in noncollegiate continuing education*

Written materials reviewed by the Committee: Letter of May 25, 1978, to Advisory Committee members, from Homer Kempter, Executive Director of the Council, with attachments and supplements; letter of June 13, 1978, to other Advisory Committee members from Nora Jean Levin, member of the Advisory Committee, with attachments.

Hearing before the Committee on behalf of the Commission: John H. Fischer, Chairman of the Commission; Homer Kempter, Executive Director of the Council; Angelo M. Spinazzola, President of the Council; C. William Taylor, Attorney.

The Commission responded to the Commissioner's denial of recognition by providing further information about the extent and nature of the universe which it is trying to serve, and by supplying evidence of numerous private, State and Federal agencies and organizations which require Office of Education recognition of accreditation before they will grant aid to continuing education students. The response was satisfactory. The Commissioner's denial of recognition was withdrawn, and recognition was granted for one year.

COUNCIL ON EDUCATION FOR PUBLIC HEALTH

December 12-15, 1978: 1. *Interim report.* 2. *Petition for an extension of scope of recognition to include accreditation of graduate programs offered outside schools of public health in community health education and in community health/preventive medicine.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the report; petition for extension of scope of recognition and supporting documentation submitted by the Council; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 1 by a representative of the Council: Janet A. Strauss, Executive Director.

In his letter of August 25, 1977, the Acting Commissioner of Education requested the Council to submit a report demonstrating further progress in developing a pool of on-site evaluators; establishment of more detailed written complaint review procedures, especially those regarding furnishing the complainant with a response concerning the Council's disposition of the complaint; action on several minor procedural matters related to criterion (d)(2) (no conflicts of interest) of the Criteria for Recognition; and progress toward compliance with criterion (b)(5) (assessment of the validity and reliability of its standards). The Council's report adequately addressed all concerns except the last one. The report was accepted, and the Council was requested to submit to the Advisory Committee, in one year, an additional report demonstrating progress toward compliance with criterion (b)(5).

During the December meeting, the Council also submitted a petition for an extension of its scope of recognition. The Council demonstrated satisfactory compliance with most of the Criteria for Recognition relative to an extension of scope, but certain concerns remained regarding some areas of the Criteria. Therefore, recognition was granted until the Council's next

scheduled full review (September 1981). The Council was requested to submit to the Advisory Committee, in one year, a report containing further documentation that it has the financial resources to conduct its expanded scope of activities—criterion (a)(3)(ii); evidence of further progress in developing a program of validation of its programmatic accreditation standards—criterion (b)(5); and evidence of development by the Council of policies and a monitoring system relative to the manner in which educational institutions or programs refer to their status with the Council—criterion (b)(10).

Dr. Barbara H. Knudson, a member of the faculty of the University of Minnesota, abstained from voting on either the report or the petition, because the Chairman of the Council is also a member of the faculty of the University.

FOUNDATION FOR INTERIOR DESIGN EDUCATION RESEARCH, COMMITTEE ON ACCREDITATION

November 1-2, 1978: *Petition for renewal of recognition for accreditation of programs of interior design in junior and community colleges, trade and technical schools, professional schools, baccalaureate level schools and colleges and graduate schools.*

Written materials reviewed by the Advisory Committee: petition and supporting documentation submitted by the Committee on Accreditation; DEAE staff analysis of the petition.

Oral presentations before Subcommittee 1 on behalf of the Committee on Accreditation: Anna Brightman and William R. Whaley, members of the FIDER Board of Trustees; Edna V. Kane, Administrative Assistant for FIDER.

The Committee on Accreditation demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

JOINT COMMISSION ON DANCE AND THEATER ACCREDITATION, SPONSORED BY THE NATIONAL ASSOCIATION OF SCHOOLS OF ART AND THE NATIONAL ASSOCIATION OF SCHOOLS OF MUSIC

December 12-15, 1978: *Petition for an extension of the scope of recognition of the National Association of Schools of Art and the National Association of Schools of Music to include accreditation of independent dance and theater institutions.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Commission; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 2 on behalf of the Commission: Samuel Hope, Executive Director, National Association of Schools of Music.

In order to accommodate the needs of dance and theater schools, which have not been served by a nationally recognized accrediting agency, these two agencies, both recognized by the Commissioner, expanded their operations by developing a joint commission. They perceived this action as an interim procedure until a permanent accrediting structure can be developed for these fields. They noted that it would take at least two years for schools in these fields to create accrediting operations which would be able to meet the Commissioner's Criteria for Recognition. The agencies were commended for this novel approach, and extension of scope of recognition was granted for three years. Because of the relative newness of this activity, the Commission was requested to submit to the Advisory Committee, in one year, a report on its progress in implementing the standards and procedures for accrediting independent dance and theater schools.

Mr. R. Harcourt Dodds of the Ford Foundation abstained from voting on this petition because the Ford Foundation has provided a small grant to the organization.

LIAISON COMMITTEE ON MEDICAL EDUCATION, REPRESENTING THE COUNCIL ON MEDICAL EDUCATION OF THE AMERICAN MEDICAL ASSOCIATION, AND THE EXECUTIVE COUNCIL OF THE ASSOCIATION OF AMERICAN MEDICAL COLLEGES

December 12-15, 1978: *Interim report.*

Written materials reviewed by the Advisory Committee: report and supporting documentation submitted by the Liaison Committee; DEAE staff analysis of the report; letter of December 8, 1976, to John R. Proffitt, from Alan K. Palmer, Deputy Director, Bureau of Competition, Federal Trade Commission; *Code of Ethics for LCME Members and Staff*, October 20, 1977, submitted by LCME; composition of LCME, submitted by LCME; *Criteria for Appointment of Members to LCME*, June 28, 1978, submitted by the LCME; *Physician Manpower & Medical Education, II, a Report of the American Medical Association*, June 1978, submitted by LCME; "AMA Medical School Tie Questioned by the FTC," article by Larry Kramer in the *Washington Post*, submitted by DEAE.

Oral presentations before Subcommittee 1 by representatives of the Liaison Committee: Steven Beering, Chairman of LCME; J.R. Schofield, Secretary to LCME.

In his letter of June 17, 1977, the Commissioner requested the Liaison Committee on Medical Education (LCME) to submit a report on progress made toward resolving deficiencies in its compliance with the following Criteria for Recognition: (a)(2)(II); (a)(2)(IV)(C); (b)(3)(III); (b)(3)(VI); (b)(5); (b)(8); and (d). A letter of December 8, 1978, from the Bureau of Competition, Federal Trade Commission, alleged that the LCME still has failed to comply with criteria (b)(8) (adheres to criteria/renders impartial judgments) and (d)(1) (autonomy). The Bureau recommended that LCME be required to submit progress reports at each Advisory Committee meeting held prior to September 1979, and the LCME be required to submit, in March, a detailed timetable describing steps it would take to

resolve the Bureau's concerns. The Advisory Committee concluded that the LCME was responsive to the Commissioner's concerns, and that the concerns of the Bureau of Competition would be more properly addressed during the September 1979 review of LCME. The report was accepted.

MIDDLE STATES ASSOCIATION OF COLLEGES AND SCHOOLS, COMMISSION ON HIGHER EDUCATION

March 15-17, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Commission; DEAE staff analysis of the materials submitted by the Commission; *Characteristics of Excellence in Higher Education*, submitted by Robert Kirkwood, Executive Secretary of the Commission; *Handbook for Institutional Self-Study*, submitted by Robert Kirkwood; *Accreditation, Special Programs and Off-Campus Educational Activities*, December 1977, submitted by Robert Kirkwood; *Candidacy for Accreditation with the Commission on Higher Education of the Middle States Association of Colleges and Schools*, submitted by Robert Kirkwood.

Oral presentation before Subcommittee 1 by a representative of the Commission: Robert Kirkwood, Executive Secretary.

In his letter of February 4, 1976, the Commissioner of Education requested the Commission to submit a report demonstrating progress toward compliance with the Criteria for Recognition related to the inclusion of public representatives in a policy and decisionmaking capacity; evidence of a written procedure for reviewing complaints; securing information regarding the evaluation of outputs consistent with the educational goals of the institution or program; and maintenance of a program to assess the validity and reliability of its standards. The Commission demonstrated compliance with the first three areas. The Commission did not adequately demonstrate how it assesses the validity and reliability of its standards. It has not defined "validity," and it has not demonstrated how its survey

of institutions, educational experts, State agencies and educational organizations has established the reliability of its standards. The report was accepted. The Commission was asked to address the concern regarding its compliance with criterion (b)(5) (assessment of the validity and reliability of its standards) when it submitted its petition for renewal of recognition in March 1980.

NATIONAL ACCREDITATION COUNCIL FOR AGENCIES SERVING THE BLIND AND VISUALLY HANDICAPPED

March 15-17, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the report.

Following its review in December 1975, the Council was requested to submit, annually for four years, reports on its financial stability, since concerns were raised that its financial base differs from that ordinarily associated with accrediting agencies. This report indicated a stable financial base, and the report was accepted.

NATIONAL ASSOCIATION OF PRIVATE, NONTRADITIONAL SCHOOLS AND COLLEGES

1. January 17-20, 1978: *Petition for initial recognition for accreditation and preaccreditation as "Candidate for Accreditation" of nontraditional proprietary and private non-profit postsecondary educational institutions offering degrees at all levels up to, and including, the Ph.D. degree.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Association; DEAE staff analysis of the petition; *Potential Member Institutions*, list submitted by the Association; *Potential Institutions in California*, list submitted by the Association.

Oral presentations before the Committee by representatives of the Association: H. Earl Heusser, Executive Director, Commission on Postsecondary Education; John B. Curtis, President, Western Colorado University; John H. O'Neill, President, University of Sarasota.

The Committee also heard a presentation on evaluation of non-traditional education by Grover Andrews, Associate Executive Secretary, Commission on Colleges, Southern Association of Colleges and Schools, who was chairing a Council on Postsecondary Accreditation Task Force on the Assessment of Nontraditional Education.

The Association failed to demonstrate satisfactory compliance with the following Criteria for Recognition: (a)(2)(i) (administrative personnel); (a)(2)(iv) (uses competent and knowledgeable persons); (a)(2)(iii)(A) (self-analysis shall be a qualitative assessment and involve administrative staff, faculty, students and other appropriate constituencies); (b)(1)(i) (serves a clearly identified need); (b)(3)(i) (affords initial discussion during on-site visit); (b)(3)(iii) (site visit reports to comment on where institution is not in compliance with agency's standards); (b)(4) (fosters ethical practices); (b)(6) (secures information regarding programs of evaluation of outputs); (b)(8) (accredits only institutions which meet published standards and evaluations are conducted and decisions rendered under conditions assuring impartial and objective judgments); (c)(1) (acceptance throughout the United States); (d)(1) (autonomy); and (d)(2) (provides against conflicts of interest). The Committee recommended that recognition be denied, but that the Association be commended for the progress which it had made since its last review in 1976. The Committee also recommended that the Association be encouraged to review a forthcoming report (expected to be available in October 1978) on a study of the assessment of nontraditional education being conducted by the Council on Postsecondary Accreditation.

On January 27, 1978, the Association submitted to the Commissioner a response to the Advisory Committee's recommendations. In its response, the Association disagreed with the Committee's assessment of its accreditation procedures, and criticized the Committee's procedures for the review of this petition. The Commissioner approved the Advisory Committee recommendations on June 6, 1978. Before making his action final, however, the Commissioner offered the Association an opportunity for an additional hearing before the Advisory Committee.

2. December 12-15, 1978: *Response to Commissioner's denial of initial recognition for accreditation and preaccreditation as "Candidate for Accreditation" of nontraditional proprietary and private nonprofit postsecondary educational institutions offering degrees at all levels up to, and including, the Ph.D. degree.*

Written materials submitted to the Committee by the Association: petition (with exhibits) for reconsideration of the recommendation of denial of recognition of the National Association of Private, Nontraditional Schools and Colleges, September 1, 1978, submitted by Elroy H. Wolff and Michael A. Nemeroff, attorneys for the Association; memorandum of December 5, 1978, from Sidley & Austin (law firm for the Association), containing response to DEAE staff comments on the petition for reconsideration; *Policy Statements and Revisions Approved for Inclusion in the Association's 1979 Revision of the Handbook on Accreditation and Other Basic Documents*; *Handbook on Accreditation*, 1977 Revision; letter of August 22, 1977, to Ronald S. Pugsley, Acting Chief, AAEB, DEAE, from H. Earl Heusser, President and Acting Executive Director of the Association; correspondence between the Association and institutions in the following categories: member institutions, institutions approved for application, withdrawals from membership, withdrawals from application process, letters of intent to apply which have not materialized, membership applications denied, and prospective applicants; testimony of Dr. Daniel J. Burke; testimony of Dr. H. Earl Heusser; testimony of John Peterson.

Written materials submitted to the Committee by DEAE: DEAE staff comment on petition for reconsideration, October 3, 1978; letter of March 26, 1976, to the Commissioner from J. Boyd Page, President, the Council on Graduate Schools in the United States (which expressed concern about the low quality of much of the nontraditional graduate education currently offered in this country); letter of January 23, 1978, to the Commissioner from John B. Curtis, Chairman, Standards Committee of the Association; memorandum of March 24, 1978, to the Commissioner from John R. Proffitt; DEAE staff analysis of the Association's petition for initial recognition, January 18-20, 1976.

Written materials submitted to the Committee by Lyn Gubser, Director, National Council for Accreditation of Teacher Education: letter of October 13, 1978 [sic], to members of the Advisory Committee.

Oral presentations before the Committee on behalf of the Association: H. Earl Heusser, Executive Director of the Association; Elroy H. Wolff, Counsel for the Association; John B. Curtis, Western Colorado University; John H. Peterson, Chief, Office of Private Postsecondary Education, California Department of Education; Daniel J. Burke, Educational Consultant.

Oral presentation before the Committee by a representative of the National Council for Accreditation of Teacher Education: Lyn Gubser, Director of the Council, who opposed recognition of the Association.

As a result of the additional material submitted by the Association and DEAE, and the hearing before the Advisory Committee, the Association was judged to have achieved compliance with criterion (b)(3)(i), and to have progressed significantly toward potential compliance with criterion (b)(3)(ii). A final judgment on its compliance with this criterion could not be made without an Office of Education observation of a site visit conducted by Association evaluators. The Committee found that the

Association still had not complied with the remaining criteria cited during its January review, and that it was not in compliance with criterion (a)(3)(ii) (preaccreditation status properly related to accreditation status). The Commissioner therefore upheld his previous decision to deny recognition.

Dr. Xavier A. Del Buono, of the California Department of Education, abstained from voting on this petition because a member of his staff appeared on behalf of the Association during its hearing.

NATIONAL ASSOCIATION OF TRADE AND TECHNICAL SCHOOLS, ACCREDITING COMMISSION

1. November 1-2, 1978: 1. *Petition for renewal of recognition for accreditation of private trade and technical schools.* 2. *Petition for an extension of scope of recognition to include accreditation of all resident course offerings of a private school primarily engaged in trade or technical training.*

Written materials reviewed by the Committee: petitions and supporting documentation submitted by the Commission; DEAE staff analysis of the petitions.

Oral presentations before Subcommittee 2 on behalf of the Commission: M. Robert Allen, Chairman and public member of the Commission; William A. Goddard, Secretary of the Commission.

Action on these petitions was postponed until the December 1978 Advisory Committee meeting, because the Committee was unable to complete its discussions before adjournment of the meeting.

Dr. Xavier A. Del Buono abstained from discussion and voting on these petitions because the California Department of Education is engaged in discussions with the Commission regarding its degree-granting programs.

2. December 12-15, 1978: 1. *Petition for renewal of recognition for accreditation of private trade and technical schools, including associate and baccalaureate degrees.* 2. *Petition for an extension of scope of recognition to include accreditation of resident course offerings of a private school primarily engaged in trade or technical training.*

Written materials reviewed by the Committee: petitions and supporting documentation submitted by the Commission; letter of November 27, 1978, with attached report, submitted by M. Robert Allen, Chairman of the Commission; DEAE staff analysis of the petitions, November 1-2, 1978; addendum to DEAE analysis of the petitions, November 30, 1978.

The Commission demonstrated satisfactory compliance with the Criteria for Recognition, including those pertaining to an extension of scope of recognition. The Committee had concerns over recommendations for minor changes in standards and procedures regarding the Commission's accreditation of degree-granting programs. The Committee also expressed concern over the vagueness of the term "primarily" regarding the request for extension of scope, and about the relative newness of this activity. Recognition was continued for four years, and extension of scope of recognition was granted. The Commission was requested to submit to the Advisory Committee, in one year, a report on its activities in the degree-granting area, and on its activities in its expanded scope of operations.

NATIONAL COUNCIL FOR ACCREDITATION OF TEACHER EDUCATION

1. March 15-17, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the report.

In a letter of August 23, 1977, responding to a previous report submitted by the Council, the Commissioner requested a

report addressing concerns regarding (1) the timeliness and effectiveness of its procedures for admitting constituent (voting) members—criterion (a)(2)(i)—and (2) the Council's procedures for selecting public representatives to its policy and decision-making body—criterion (b)(2)(i). In reviewing the Council's report, the Committee noted that the Council still included only one public representative, whereas the Office of Education Criteria for Recognition require more than one. In addition, the Council informed the Committee that it had changed its procedures for admitting constituent members, and had in fact admitted new constituent and associate members. The Committee, however, was not provided copies of the new procedures. The report was found unresponsive to the concerns identified previously by the Commissioner and the Committee, and the Council was requested to submit, at the June 1978 Advisory Committee meeting a written oral report demonstrating steps it has taken to comply with the criteria cited above.

2. June 21-23, 1978; *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Council; DEAE staff analysis of the report.

Oral presentation before Subcommittee 2 by representatives of the Council: Dale Scannell, Chairman; Lyn Gubser, Director.

The Council responded satisfactorily to concerns cited during the March Advisory Committee review, and the report was accepted.

NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES, COMMISSION ON INDEPENDENT SCHOOLS

January 17-20, 1978: *Petition for an extension of scope of recognition to include accreditation of grades K through 12.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Commission; DEAE staff analysis of the petition.

The Commission demonstrated satisfactory compliance with the Criteria for Recognition. Extension of scope of recognition was granted until June 1980, when review of this activity will be conducted in conjunction with the review of the Commission's other accrediting activities.

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS, COMMISSION ON OCCUPATIONAL EDUCATION INSTITUTIONS

March 15-17, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Commission; DEAE staff analysis of the report.

In a letter of January 27, 1977, the Commissioner of Education requested the Commission on Occupational Education Institutions to submit a report on the development of a cooperative program with other Commissions of the Association to deal with the lack of access of shared-time area vocational centers to accreditation. The report also was to comment on the implementation of liaison between the Commission and accrediting agencies already operating in the field of proprietary occupational education. The report satisfied the first request of the Commissioner, and the Commission supplied satisfactory evidence of efforts to establish liaison with most accrediting agencies operating in the field of proprietary education. However, there was no information on steps taken by the Commission to establish liaison with the Cosmetology Accrediting Commission, a major agency operating in the field. The report was accepted, and the Division of Eligibility and Agency Evaluation was directed to inquire about the establishment of a relationship between the two agencies.

B. State Agencies Recognized for the Approval of Public Postsecondary Vocational Education

INDIANA STATE BOARD OF VOCATIONAL AND TECHNICAL EDUCATION

January 17-20, 1978: *Request for withdrawal of recognition.*

Written materials reviewed by the Committee: letter of September 12, 1977, to John R. Proffitt from Don K. Gentry, Executive Officer of the Board.

Oral presentation before Subcommittee 2 by a representative of the Board: Phillip M. Mann, State Coordinator of Postsecondary Programs and Evaluation, Indiana State Department of Education.

Pursuant to a request from the Board, recognition was withdrawn. The Board indicated that the Commission on Institutions of Higher Education, North Central Association of Colleges and Schools, through its accreditation process, was meeting the eligibility needs of Indiana's vocational institutions and programs.

KANSAS STATE BOARD OF EDUCATION

December 12-15, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Board; DEAE staff analysis of the report.

In his letter of August 23, 1977, the Commissioner requested the Board to submit a report demonstrating compliance with criteria (b)(1)(iv) (review of complaints) and (b)(1)(vi) (assurance of impartiality in its decisionmaking process). The Board did so, and its report was satisfactory. The report was accepted.

KENTUCKY STATE BOARD OF EDUCATION

January 17-20, 1978: *Request for withdrawal of recognition.*

Pursuant to a request of the Board, recognition was withdrawn. The Board indicated that the eligibility needs of vocational education in Kentucky were being met by the Commission on Occupational Education Institutions of the Southern Association of Colleges and Schools.

MINNESOTA STATE BOARD OF VOCATIONAL-TECHNICAL EDUCATION

1. January 17-20, 1978: *Interim report.*

Written material reviewed by the Committee: report and supporting documentation submitted by the Board; DEAE staff analysis of the report.

Oral presentation before Subcommittee 1 by a representative of the Board: Robert Anderson, Supervisor of Accreditation and Evaluation, Minnesota Department of Education.

An interim report submitted by the Board in June 1977 was rejected as unsatisfactory because it did not adequately demonstrate how the Board planned to implement procedures for a comprehensive self-evaluation—criterion (a)(3)(ii)(A) (qualitative assessment) of the Criteria for Recognition—and how it compiles a composite report of findings of the on-site review team—criterion (b)(2)(ii) (written report furnished). The Board was therefore requested to submit additional information on these matters within six months. The Board's report in January 1978 indicated potential compliance with these areas of the Criteria, but further information was needed. The report was accepted, but the Board was requested to submit to the Advisory Committee, at its June 1978 meeting, sufficient written and oral evidence of compliance with the two criteria cited above. As evidence of compliance, the Board was requested

to provide at least two institutional self-studies and evaluation composite reports completed in conjunction with the Board's revised self-study guide and evaluation procedures.

2. June 21-23, 1978: *Interim report.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Board; DEAE staff analysis of the report.

Oral presentation before Subcommittee 2 by a representative of the Board: Robert Anderson, Supervisor of Accreditation and Evaluation, Minnesota State Department of Education.

The Board complied with the request of the Acting Commissioner of Education following its January 1978 review. The report was accepted.

NEW JERSEY STATE BOARD OF EDUCATION

December 12-15, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 2 by a representative of the Board: Richard B. Harnack, Director, Vocational/Technical Student Assistance Programs, Division of Vocational Education, New Jersey Department of Education.

The Board demonstrated satisfactory compliance with all of the Criteria for Recognition except criterion (b)(1)(ii). Regarding that criterion, the Advisory Committee found that the roles of local and state advisory committees in the approval process were not strong enough. The Board's representative at the meeting agreed, and indicated a willingness to pursue this matter. Therefore, recognition was continued for four years,

and the Board was requested to submit to the Advisory Committee, in one year, a report describing steps it has taken to improve the roles of local and state advisory committees in making meaningful contributions to the approval process.

OKLAHOMA STATE REGENTS FOR HIGHER EDUCATION

January 17-20, 1978: *Petition for renewal of recognition for approval of vocational education programs for which credit earned is applied toward a degree, diploma, or other postsecondary academic or collegiate award, or which are given at State institutions comprising the Oklahoma State System of Higher Education.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Regents; DEAE staff analysis of the report.

Oral presentation before Subcommittee 1 by a representative of the Regents: Dan Hobbs, Vice Chancellor for Academic Affairs.

The Regents demonstrated satisfactory compliance with all but eight of the Criteria for Recognition. Regarding those eight areas (listed below), the Regents appeared to comply with the spirit of the Criteria, and merely needed to formalize their procedures in writing. Recognition was continued for four years. The Regents were requested to submit to the Advisory Committee, in one year, a report describing action taken regarding:

- (1) a clearer articulation of the kinds and levels of programs covered by the agency's evaluation procedures and activities—criterion (a)(1)(ii);
- (2) publication of a separate set of criteria for the three levels of programs offered—criterion (a)(1)(iii).
- (3) inclusion of a non-discriminatory statement relative to the selection of personnel—criterion (a)(2)(iii);

(4) definition of the three approval status recommendations that may be advanced by the agency's evaluation team—criterion (a)(3)(i);

(5) written notation of the involvement of the administration, staff, governing body, students and others in making the self-analysis and the onsite visit—criterion (a)(3)(ii)(A);

(6) written guidance for the evaluation team concerning the necessity for discussion with the faculty, administrative staff, students and others during the onsite visit—criterion (b)(2)(i); and

(7) amendment of the Procedures for Appeal to include a written statement to be provided to the institution's chief executive officer concerning the agency's appeal decision—criterion (b)(2)(viii)—and written statement that the program's approval status is to remain intact during the appeal process—criterion (b)(2)(iv).

UTAH STATE BOARD FOR VOCATIONAL EDUCATION

December 12-15, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 2 by a representative of the Board: Vaughn L. Hall, Associate State Superintendent for Vocational Education, Utah Department of Education.

The Board demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

C. State Agencies Recognized for the Approval of Nurse Education.

CALIFORNIA BOARD OF REGISTERED NURSING

December 12-15, 1978. *Petition for renewal of recognition*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; DEAE staff analysis of the petition.

The Board demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

IOWA BOARD OF NURSING

December 12-15, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 2 by representatives of the Board: Wilda Wegner, Associate Director of the Board. Helen Lobes, also an Associate Director, was available to answer questions, but had no presentation.

The Board demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

LOUISIANA STATE BOARD OF NURSING

December 12-15, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; DEAE staff analysis of the petition.

The Board demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

MISSOURI STATE BOARD OF NURSING

December 12-15, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 2 by representatives of the Board: Vivian D. Meinecke, Executive Director; Audrey Jenkins, President.

The Board demonstrated satisfactory compliance with the Criteria for Recognition. Recognition was continued for four years.

MONTANA STATE BOARD OF NURSING

January 17-20, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: report and supporting documentation submitted by the Board; DEAE staff analysis of the report.

The Board demonstrated satisfactory compliance with the Criteria for Recognition. Concerns were raised regarding the Board's practice of using only Board or staff members on its on-site visitation teams. Although the practice is not in violation of the Criteria, it raises concerns about due process procedures. Recognition was continued for four years. The Board was asked to consider broadening the membership of its on-site visiting teams to include at least one member with broad knowledge and experience in nurse education and practice who is not a member of the Board's staff or policy or decision-making body.

NEW YORK STATE BOARD OF REGENTS (NURSING EDUCATION UNIT)

December 12-15, 1978: *Petition for renewal of recognition.*

Written materials reviewed by the Committee: petition and supporting documentation submitted by the Board; *Presentation on Behalf of the New York Board of Regents before the Office of Education's Advisory Committee on Accreditation and Institutional Eligibility*, December 12, 1978, by Mildred Schmidt; DEAE staff analysis of the petition.

Oral presentation before Subcommittee 2 on behalf of the Board: Mildred S. Schmidt, Executive Secretary to the State Board of Nursing and Administrator, Nursing Education Unit, Office of the Professions, State Education Department.

Concerns were identified regarding the Board's compliance with the following Criteria for Recognition.

3e(1), The annual report does not adequately address institutional objective attainments. Particularly, there is no comprehensive measure of stated objective achievement on an annual basis.

3e(9), Although curriculum design is included in school catalogs and applications for registration, it is not included in the annual report, thereby creating cause for concern about dissemination of up-to-date information to students.

3e(11), Contractual arrangements pertaining to the academic program are not part of the annual report. Although they are reviewed during site visits, the length of the site visit cycle (five years) raises concerns about adequate monitoring of contractual arrangements.

3f(1), Financial audits are conducted annually for institutions receiving State aid under the Bundy program. Hospital schools, however, which are not part of the program, are not audited. The Advisory Committee regarded the Board's non-compliance with this criterion as cause for the greatest concern.

4b. There are no published procedures for revocation and reinstatement of accreditation.

Because of the above deficiencies, recognition was continued for six months. The Board was requested to direct special attention to these concerns when it submits its petition for renewal of recognition.

D. Requests for the Award of Eligibility Status for Federal Funding Programs Based upon Determinations of Satisfactory Assurance that the Institutions Will Meet Accrediting Standards within a Reasonable Period of Time, Pursuant to the Higher Education Act of 1965, as Amended, Section 1201(a)(5)(A)

BROOKHAVEN COLLEGE, DALLAS COUNTY COMMUNITY COLLEGE DISTRICT, FARMERS BRANCH, TEXAS

November 1-2, 1978

Written materials reviewed by the Committee: report of the OE site review team, August 28, 1978.

The Commission on Colleges of the Southern Association of Colleges and Schools had scheduled a site visit to the College for December 1978, and was expected to act upon the team's report shortly thereafter. On this basis, and on the basis of the report of the OE site review team, the Advisory Committee judged that there was satisfactory assurance that the school would meet the accrediting standards of the Commission on Colleges within a reasonable period of time. Eligibility Status was granted. In order to qualify students for participation in Federal funding programs during the first semester, the Commissioner of Education approved this recommendation on November 14, 1978.

EXTRAORDINARY LEARNING AND EDUCATIONAL COMPLEX/ANTIOCH-MINNEAPOLIS COMMUNIVERSITY, INC., MINNEAPOLIS, MINNESOTA

January 17-20, 1978

Written materials reviewed by the Committee: report of the visitation team, by William W. Jellema and Eugene I. Van Antwerp, consultants to the Office of Education.

Oral presentations before the Committee: Eugene I. Van Antwerp, Consultant to the Office of Education; Fred Sellers, College Eligibility Section, DEAE.

The Committee judged that the school would meet the accrediting standards of the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools within a reasonable period of time. Eligibility status was granted. In order to meet an urgent funding deadline, the Commissioner of Education approved this recommendation on January 23, 1978.

FLAMING RAINBOW UNIVERSITY, TAHLEQUAH/STILLWELL, OKLAHOMA

December 12-15, 1978

Written materials reviewed by the Committee: report of the OE site visit team, November 20, 1978, submitted by DEAE; requirements of the Commission on Institutions of Higher Education, North Central Association of Colleges and Schools, for eligibility for consideration of Candidate for Accreditation status, submitted by DEAE.

The Committee received information from the Commission on Institutions of Higher Education, North Central Association of Colleges and Schools, which had conducted a site visit to the school, that the site visit report would be favorable. Based

upon this information, the Committee anticipated favorable action by the Commission at its April 1979 meeting. Eligibility status was granted. In order to enable students to qualify for Federal assistance during the semester which had just elapsed, the Commissioner of Education approved this recommendation on December 22, 1978.

Dr. Barbara H. Knudson abstained from voting on this request because of a former relationship with the school.

WESTERN REGIONAL LEARNING CENTER, SAN FRANCISCO, CALIFORNIA

January 17-20, 1978

Written materials reviewed by the Committee: report of the USOE visitation team, by Leonard W. Rice and Eugene I. Van Antwerp, consultants to the Office of Education.

Oral presentations before the Committee: Eugene I. Van Antwerp Consultant to the Office of Education; Fred Sellers, College Eligibility Section, DEAE.

The Committee judged that there was not satisfactory assurance that the school would be able to meet the accrediting standards of the Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and

Colleges, within a reasonable period of time. Eligibility status was denied by the Commissioner of Education on January 23, 1978.

WOODBURY ASSOCIATES SCHOOL OF LEGAL AND CONTINUING EDUCATION, WOODBURY, VERMONT

March 15-17, 1978

Written materials reviewed by the Committee: *Report on the Woodbury Associates School of Legal and Continuing Education to the Commissioner's Advisory Committee on Accreditation and Institutional Eligibility*, submitted by Barbara H. Knudson, Professor of Continuing Education and Criminal Justice Studies, University of Minnesota at Minneapolis, and Eugene I. Van Antwerp, Consultant to the Office of Education.

Oral presentations before the Committee by the OE Panel of Consultants: Barbara H. Knudson, Professor of Continuing Education and Criminal Justice Studies, University of Minnesota at Minneapolis; Eugene I. Van Antwerp, Consultant to the Office of Education.

On the basis of the report submitted by the OE panel of consultants, the Committee judged that the school was proceeding satisfactorily toward meeting the accrediting standards of the Commission on Vocational, Technical, Career Institutions of the New England Association of Schools and Colleges. Eligibility status was granted.

PART II

COMMITTEE ACTIONS ON POLICY ISSUES

During 1978, the Advisory Committee devoted more time to policy, and considered a greater number of policy issues, than at any time since 1975—this in spite of difficulties encountered in filling vacancies on the Committee and problems with maintaining quorums and scheduling meetings. In March, five new members were sworn in to fill terms which were to have begun on July 1, 1977. They were Dr. Cleveland L. Dennard, President of Atlanta University (filling a vacancy created by the resignation of Dr. Herman R. Branson, President of Lincoln University in Pennsylvania); Ms. Linda Hill, a Ph.D. candidate at the University of Chicago; Mrs. Nora Jean Levin, President of the WorkPlace, Inc., Washington, D.C.; Dr. Kristin Morrison, Associate Professor of English at Boston College; and Marguerite C. Thew, M.D., of the University of Pennsylvania Hospital in Philadelphia. The five appointments left one vacancy on the Committee. No chairperson was appointed for the Committee.

On June 30, 1978, five members retired from the Committee. They were Dr. Donald R. McKinley, Chief Deputy Superintendent of the California State Department of Education; Dr. Anne Pascasio, Dean of the School of Health Related Professions, University of Pittsburgh (a former Chairperson of the Committee); Ms. Vicki Shell, Research Associate at the Ohio State University; Dr. Robert L. Simpson, Professor of Religion and Philosophy, Phillips University, Enid, Oklahoma; and Mr. Valieau Wilkie, Jr., Executive Vice President of the Sid Richardson Foundation, Fort Worth, Texas. The vacancies were not filled until November, when the following members were appointed: Dr. Barbara H. Knudson (the new Advisory Committee Chairperson), Professor of Continuing Education and Criminal Justice Studies, University of Minnesota; Dr. Xavier A. Del Buono, Associate Superintendent of Public Instruction, Adult and Community Education, California Department of Education; R. Harcourt Dodde, Esq., Program Officer,

Government and Law Division, Ford Foundation, New York; Dr. Morris L. Norfleet, President, Morehead State University, Kentucky; and Dr. Joan S. Stark, Dean of Education, University of Michigan. Their appointments left one vacancy on the Committee.

The problems with appointment of new members over the past years created havoc with the Advisory Committee's workload, and with its schedule of meetings. The schedule for reviews of petitions from accrediting and State approval agencies had to be extensively revised. An Advisory Committee meeting originally scheduled for December 1977 had to be postponed until January 17-20, 1978, and a meeting scheduled for September 26-29, 1978, had to be postponed until November 1-2, 1978. A meeting scheduled for October 3-4, 1978, could not be held, and instead, a planning session was conducted on those dates by a subcommittee of the Committee. For the first time since 1975, action on a petition was deferred because of lack of time and loss of a quorum. The Committee also was without a Chairperson from July 1977 until November 1978. In the interim, Dr. N. Edd Miller served as Acting Chairperson except during June 1978, when Mr. Valieau Wilkie, Jr., filled that position.

Despite these difficulties, the Committee reviewed more petitions and reports, and more policy issues, than at any other time in its recent past. Special policy sessions were conducted during the Committee's January and December meeting; a meeting on November 1 and 2 was devoted primarily to policy; and policy issues were reviewed at the March meeting.

On May 10, 1978, Hale Champion, the Acting Secretary of Health, Education, and Welfare, rechartered the Committee for two years.

MEETINGS WITH THE COMMISSIONER OF EDUCATION

During 1978, the Advisory Committee met twice with U.S. Commissioner of Education Ernest L. Boyer. On the evening of January 17, the Committee met with the Commissioner, with Deputy Commissioner for Higher and Continuing Education Alfred L. Moye, with Greome Bextor, Assistant Commissioner for Executive Operations, and with Ann V. Bailey, Office of Education Committee Management Officer. The Committee and the Commissioner engaged in a constructive exchange of views and mutual concerns. The Commissioner reaffirmed his strong support for the Advisory Committee; discussed the relationship between the Office of Education and the Council on Postsecondary Accreditation; and explained his purposes and objectives for the newly-established two-tier eligibility system. Through this system, a postsecondary education institution must satisfy eligibility requirements at two levels before qualifying for participation in Office of Education funding programs. At the first level, basic eligibility of an institution is determined primarily on its educational quality. At the second level, the institution must meet certification and compliance requirements concerning resources, integrity, finances, administration and consumer protection practices before applying for specific student financial aid programs.)

On November 2, 1978, the Commissioner met with the Committee to discuss a wide range of issues. The Commissioner noted that the Administration's request for reauthorization of the Higher Education Act would be presented sometime in January. He invited the Committee to review those aspects of the legislation effecting accreditation and institutional eligibility, and suggested that there would still be time to consider the Committee's comments after its December meeting. The Committee's recommendations on this issue will be found later in this section.

Regarding the appointment procedures for advisory committees, the Commissioner suggested that some of the difficulties which advisory committees had been experiencing were due

to the change in administration. He also indicated that his office would be willing to consider possible legislative action to extend terms of committee members until replacements could be appointed, provided that such legislation would apply to all advisory councils.

The Commissioner agreed to the Committee's request to delay publication of the proposed revised Criteria for Recognition until he could receive the Committee's comments. The Committee's recommendations are found later in this section.

On the issue of the role of the Commissioner and the Committee in recognizing accrediting agencies, the Commissioner stated that the Office of Education has the responsibility to establish a baseline of institutional integrity which would make it possible for all Federal agencies to separate the legitimate from the fraudulent. While emphasizing that his remarks should not be interpreted as OE policy statements, he observed that although there is inclination toward proliferation in accreditation, it is not the Committee's responsibility to reduce proliferation through refusal to review agencies which deal with institutions which will do business with the Federal government.

Commenting on a draft of a GAO report on the Office of Education's institutional eligibility system, the Commissioner found its recommendations to be supportive of the Office of Education's eligibility determination system as a whole. He suggested that most of the GAO recommendations could be satisfied by improved administration.

In addition to the meetings with the full Committee, the Commissioner met with the Policy Review Subcommittee of the Advisory Committee on January 20, 1978. Members of the Subcommittee were: Dr. N. Edd Miller, Dr. Anne Pascasio, Dr. Donald R. McKinley, Mr. Velleau Wilkie, Jr., and Mrs. Nora Jean Levin. The meeting revolved primarily around the increasing friction in the relationship between the Office of Education and the Council on Postsecondary Accreditation (COPA). As a

result of the meeting, the Commissioner created an ad-hoc liaison committee between the Council on Postsecondary Accreditation and the Advisory Committee, chaired by Graeme Baxter. Representatives of COPA were: Dr. Dana B. Hamel, Chairman of the COPA Board and Chancellor of the Virginia Community College System; Dr. Lloyd H. Elliott, President of The George Washington University and former Chairman of the COPA Board; and Dr. Richard R. Weeks, Dean of the College of Business Administration, University of Rhode Island. The Advisory Committee was to be represented by Dr. N. Edd Miller, Mr. Valteau Wilkie, Jr., and Mrs. Nora Jean Levin. Staff support was to be provided by Dr. Kenneth E. Young, President of COPA, and Mr. John R. Proffitt, Director of DEAE.

At the first meeting of the ad-hoc committee, on March 14, 1978, the group agreed that they needed to explore jurisdictional issues regarding reliance on accreditation and institutional oversight in the area of eligibility. They noted a need to defuse the emotionalism which had characterized the relationship between COPA and the Advisory Committee, and to identify common grounds. Once these goals were established, the ad-hoc committee was to work toward identifying differences in the respective roles of COPA and the Advisory Committee, and to strive to formalize these roles in areas where ambiguity existed.

OCTOBER 3-4 SUBCOMMITTEE PLANNING SESSION

In anticipation of new appointments to the Advisory Committee, meeting arrangements were concluded for September and October. When the appointments were not forthcoming, the meetings were cancelled and petition reviews were rescheduled for future meetings. To deal with the continuing problems created by vacancies on the Committee, a subcommittee met on October 3 and 4 to plan future Advisory Committee activities. The subcommittee reviewed the status of a wide variety of policy issues, including revision to the Criteria for Recognition of Accrediting Bodies and State Agencies, proposed appeals procedures for negative actions of the Com-

missioner of Education, proposed regulations affecting institutional eligibility, the issuance of various contracts for research projects, and reports on conferences to be held and proceedings to be issued. The subcommittee developed a schedule and format for review of policy issues by the Advisory Committee on November 1 and 2.

CRITERIA FOR RECOGNITION OF NATIONAL ACCREDITING BODIES AND STATE AGENCIES

The Advisory Committee pursued its continuous review of revision to the Criteria for Recognition of National Accrediting Bodies and State Agencies, mandated by the Secretary of Health, Education, and Welfare when the Criteria were published on August 20, 1974. The review process was lengthy, since several steps involved solicitation for public comment, and since administrative procedures within the Department of Health, Education, and Welfare caused repeated delays.

In March, the Advisory Committee discussed the Federal government's and the Advisory Committee's role and authority regarding (1) the recognition of accrediting agencies, (2) consumer protection issues, and (3) determinations of institutional eligibility. The Committee also received a status report from the Educational Testing Service on an Office of Education-funded project, "Evaluation of OE Criteria for Recognition of Accrediting and State Approval Agencies." No formal action was required on either of these matters.

During its November 1-2 meeting, the Committee reviewed a draft of proposed revisions to the Criteria for Recognition, and identified those specific items which it wished to pursue in detail in December. The Committee concluded that since the Criteria had not had an intensive Advisory Committee review since 1975, publication in the FEDERAL REGISTER should be delayed until its comments could be provided to the Commissioner. The Commissioner agreed to delay of publication. The Committee, at this meeting, also reviewed a DEAE *Analysis of*

the U.S. Office of Education's Role in Recognizing Accrediting Agencies, prepared in response to the COPA analysis, as well as a report entitled *The Commissioner's Authority to List Accrediting Agencies and Associations: Necessity for an Eligibility Issue*; by Margaret Conway, of HEW's Office of the General Counsel. No formal action was taken.

The Committee met jointly, on November 1, with five members of the Task Force on Future USOE Criteria for Recognition of Accrediting Bodies and State Agencies, and received a status report on its progress. The Task Force is engaged in a five year project to develop criteria suitable for the 1980s. Members of the Task Force who were able to be present were: Samuel P. Martin, M.D. (Chairperson), Executive Director of the Leonard Davis Institute, Philadelphia, Pennsylvania; Dr. Richard J. Bradley, Executive Director of the New England Association of Schools and Colleges; Dr. Thurston E. Menning, Director of the Commission on Institutions of Higher Education, North Central Association of Colleges and Schools; Dr. Richard M. Millard, Director of the Postsecondary Education Department, Education Commission of the States; and C.H. William Ruhe, M.D., Senior Vice President for Scientific Affairs of the American Medical Association.

In December 1978, the Advisory Committee, through formal action, made the following recommendations regarding the proposed revisions to the Criteria for Recognition of National Accrediting Bodies and State Agencies:

1. Areas to Be Highlighted in the Preamble

Four areas were identified for highlighting for public comment in the preamble of the proposed FEDERAL REGISTER notice. They are: Section 149.1, Scope (while the Committee was able to reach consensus on this matter—see below—it considered the issue important enough to encourage special attention by the public); Section 149.2, Definitions, specifically "representatives of the public" (identified by the Committee for the same reason for which it highlighted "Scope"); Section

149.5(b), concerning recognition of more than one agency in a given field (the Committee was unable to reach consensus on this issue); and Section 149.6(b), concerning a suggestion to add a criterion stipulating that an agency conduct objective surveys to measure the sense of satisfaction or discontent of its membership (here again, the Committee was unable to reach consensus).

2. Section 149.1 (c), Scope

While the language of this section was not considered perfect, it was acceptable for defining the Commissioner's role in publishing a list as the Committee understood that role. The Committee emphasized references in this section to reliance on this list by Federal agencies.

3. Section 149.2, Definitions

The language of the definition of representatives of the public was not perfect, but it was acceptable to the Committee, which endorsed it.

4. Revisions to Proposed Criteria Language

The Committee recommended that two of the proposed criteria be revised. There was a need to restore the original reference to the chief executive officer of an institution or program in criterion (c)(1)(vii) (opportunity to comment on visiting team report). The Committee was concerned that omission of this reference could lead to opportunities to circumvent established chains of command within an institution or program. The Committee recommended the addition of another criterion as (e)(1), to read: "[The agency or association:] (1) Has organizational independence and autonomy suitable to enable it to develop and administer its criteria on an objective basis." The Committee intended, through this revision, to strengthen the application of those criteria relative to the autonomy of an agency.

5. Editorial Changes

The Committee recommended incorporation of minor editorial changes into the definitions of "accreditation" and "specialized accreditation," and in the following proposed criteria: (a)(5) (need); (b)(5) (acceptance); (c)(1)(iv) (opportunity to comment on visiting team members); and (c)(1)(x) (participation in self-analysis).

These formal recommendations did not require the immediate action of the Commissioner, since his opportunity to approve or disapprove any changes would follow the preliminary administrative review of the Criteria which is required of all HEW regulations. Instead, the Committee's revisions and comments were incorporated by DEAE into the draft documents being reviewed by HEW officials.

Finally, during the December meeting, Subcommittee 2 of the Committee, which reviewed five State agencies recognized for the approval of nurse education, recommended that the Criteria for Recognition of State Agencies for the Approval of Nurse Education be revised. Its recommendation was prompted by a number of recurring problems identified in most State agency approval processes. A common practice of using staff or board members exclusively for site visits raised questions about the reference to impartial and objective judgments in the criteria, and was identified as an agenda item for discussion at a future meeting.

ISSUES REGARDING REAUTHORIZATION OF THE HIGHER EDUCATION ACT OF 1965

During its October meeting, the planning subcommittee of the Advisory Committee briefly reviewed elements of the Administration's proposed request for reauthorization of the Higher Education Act of 1966. The Advisory Committee again reviewed issues connected with reauthorization of the act during its November meeting. The Commissioner, in his session with the Committee, invited the Committee to provide its

recommendations on those matters affecting accreditation and institutional eligibility by January 1979. The Committee scheduled detailed discussion of these issues for its December meeting.

During its December meeting, the Committee reviewed four questions posed by issues related to reauthorization of the act, and, through formal action, provided responses which were intended to comprise recommendations to the Commissioner during the development of legislative language. The Advisory Committee's recommendations were:

1. *Should the statutory charge to the Commissioner be revised to require the Commissioner to determine if accrediting agencies and State approval agencies are reliable authorities concerning institutional or programmatic "integrity" as well as institutional or programmatic "quality"? The Committee concluded that the current language, which refers only to "quality," is satisfactory. The Committee indicated that it believes "integrity" is inherent in the term "quality," and suggested that changes in the statutory language in this case could have the effect of imposing limits on the Office of Education's capacity for administrative discretion.*
2. *Should the Office of Education provide grants to nationally recognized accrediting agencies to help them strengthen their capabilities to perform institutional and program reviews? The Committee was particularly concerned about insuring against conflicts of interest between the Office of Education and the agencies which it recognizes, and about providing an additional opportunity for the Federal government to exercise control over the private sector. Nevertheless, the Committee recognized a need for Federal assistance to accrediting agencies, particularly in view of its position that the accreditation component of the eligibility "Triad" (i.e., State government, Federal government, and private accreditation) should be strengthened. The Committee therefore recommended that such grants should be provided, as long as conditions that these grants do not involve any greater measure of control*

over the accrediting agencies than is now exercised by the Federal government through the procedures of this Advisory Committee. The Committee specified that such grants should be for developmental purposes rather than for operational support.

3. *Should there be statutory authorization for the Commissioner of Education's Advisory Committee on Accreditation and Institutional Eligibility?* The Committee noted that statutory authority might confer a greater degree of stability on the existence of the Committee, as well as increase its viability and accessibility to the public. The Committee also considered that once written into law, it might be more difficult to abolish the Committee should the need for the Committee disappear. The Committee also was concerned that an affirmative answer to this question could be interpreted as self-serving. The Committee concluded that the Commissioner is in the best position to determine how to meet statutory obligations, and therefore voted that it would support the Commissioner's judgment as to whether or not the Advisory Committee should be established by a specific statute.

4. *Should the Office of Education provide operating grants to States for the purpose of strengthening authorization/licensing agencies which aid in establishing eligibility of postsecondary educational institutions for Federal funds?* The Committee here again considered the need for strengthening the role of State agencies as full partners in the eligibility "Triad," and therefore recommended that Federal funds should be provided.

Overall Policy Direction Regarding Institutional Eligibility

After considering the four questions above, the Committee considered some overall policy alternatives regarding institutional eligibility. These included: (1) *Should the present Federal eligibility structure, which places dominant reliance upon accreditation, be retained unchanged?* (2) *Should the Office of Education undertake efforts to develop a dominant role in the*

eligibility system for either (a) State legal authorizing agencies or (b) State approval/accrediting agencies? and (3) *Should the Office consider establishing its own Federal approval/accrediting system for purposes of eligibility?* After specifically rejecting the third alternative, the Committee found that its earlier policy discussions had led it to conclude with the recommendation that the current Office of Education's eligibility system should be strengthened to effect a more balanced reliance upon accrediting agencies and State legal authorizing agencies.

POLICY REGARDING DETERMINATION OF ELIGIBILITY OF FOREIGN MEDICAL SCHOOLS FOR PARTICIPATION IN THE GUARANTEED STUDENT LOAN PROGRAM

In February 1978, the Office of Education engaged a panel of consultants, composed of Chairperson Barbara Knudson, professor of continuing education and criminal justice studies, University of Minnesota at Minneapolis; Samuel P. Martin, M.D., Executive Director, Leonard Davis Institute, University of Pennsylvania; Robert R. Ramsey, Jr., immediate past Secretary of Education of the Commonwealth of Virginia; and John L. Thurston, Vice President of the Institute of International Education, Washington, D.C. The panel was charged with identifying the criteria necessary to insure that a medical school located outside the United States is comparable to a medical school within the United States, for purposes of institutional participation in the guaranteed student loan program.

The panel submitted a report indicating the extreme complexity of the issue, and reviewing five alternatives to deal with the problem. These alternatives included: (1) that there is no adequate way to determine comparability short of creation of an international accreditation mechanism; (2) that foreign institutions be required to submit substantially more comprehensive information than is currently available (something similar to an institutional self-study); (3) that eligibility be based upon listing in the World Health Organization directory; (4) that special

accreditation procedures be developed for foreign institutions serving predominantly American students; and (5) the recommendation below, which was adopted through formal action by the Advisory Committee and forwarded to the Commissioner:

"Through formal action, the Committee recommends that the Commissioner establish a procedure which is an "outcome" measure—that is, use of the performance of graduates of the school on the Educational Commission for Foreign Medical Graduates (ECFMG) examinations. Under this recommendation, only schools whose students, as a group, achieve pass rates equivalent to the *minimal* Medical Board pass rates of students graduating from medical schools in this country would be eligible for participating in the guaranteed student loan program. The intent is that the foreign medical schools, in order to become eligible institutions for guaranteed loan purposes, should produce as high a percentage of passing students as the medical school in this country with the lowest passing proportion. This would assure that, from the regrettably limited perspective of medical knowledge, the student has been adequately prepared, at least to the minimum level of medical education in the United States. Further, the Committee recommends that no medical school should become eligible until the scores of their graduates are available for a three year period. Should the licensure procedures for all foreign medical graduates change, as is anticipated, the substitution of the Visa Qualifying Examination for the ECFMG examination should be understood as a part of this recommendation.

"The recommendation is made with the understanding that:

"(a) the Committee's recommendation is a preliminary measure based upon the limited evaluation and review of a very complex problem which needs extensive in-depth study by personnel knowledgeable in the discipline involved;

"(b) while the recommendation is limited to medical education provided to students studying abroad, this problem appears to exist as well in other fields, such as law and dentistry; and

"(c) the Committee further recommends that the Commissioner of Education and the Congress undertake an extensive review and analysis of the problem as it applies to all fields of post-secondary education, with the objective of developing an overall comprehensive policy, which might be implemented by legislation, that will balance the public interest with the need to provide students with an opportunity to enter a given field of endeavor."

The panel found that all five of its recommendations were less than satisfactory, hence the additional recommendation that further study is needed. The panel presented the various merits and objectives of each alternative, and found that the fifth alternative contained the greatest merit. The Advisory Committee reviewed all of the alternatives, together with the various strengths and weaknesses of each, considered all of the background information which was available, and reached the same conclusion. The Advisory Committee placed considerable emphasis upon the description of the measure as "preliminary," because it was responding to urgent needs, but recognized that a completely satisfactory solution could only be found after further extensive study.

The Commissioner took no action to approve or disapprove the Advisory Committee recommendation, referring it to Office of Education staff for further consideration. The Office of Education currently is preparing a set of regulations to address this matter.

PROJECTS FUNDED BY THE OFFICE OF EDUCATION

During the course of the year, the Advisory Committee followed the progress of various studies funded by the Office of Education.

1. American Institutes for Research Studies

In March, the Committee reviewed the status of four studies conducted by the American Institutes for Research: (a) Improving the Consumer Protection Function in Postsecondary Education; (b) A Field Test of Accreditation Agency Use of Strategies for Improving the Consumer Protection Function in Postsecondary Education; (c) A Review a State Oversight in Postsecondary Education; and (d) Project to Develop a Composite State Regulation for Authorizing and Monitoring Postsecondary Education Institutions.

Through formal action, the Committee directed the Policy Review Subcommittee of the Advisory Committee to review recommendations 3 through 6 of the *Executive Summary of the Final Technical Report, A Study of State Oversight in Postsecondary Education*, December 30, 1977. The subcommittee was asked to prepare a set of alternative recommendations, to be included with the original recommendations, all of which will be submitted to the other Committee members for consideration in future policy discussions. The report of the Subcommittee was to be delivered to the other Committee members in the summer of 1978 but this deadline had to be abandoned with the expiration of the terms of several members and the Committee's subsequent period of inactivity while new Committee appointments were pending. The recommendations were: (3) USOE should begin to formulate an official policy statement encouraging all states to enact and enforce state authorizing and oversight standards that meet or exceed minimum consumer protection standards; (4) USOE should strongly consider drafting and asking Congress to pass an amendment to the General Provisions section of Title IV of the Higher Education Act of 1965 providing Federal funds for States that have enacted standards more extensive than the ECS Model Legislation; (5) USOE should establish and maintain a "state licensing agency liaison center and clearinghouse;" and (6) USOE should contract for the services of an organization of national reputation to plan and carry out a

continuing program of staff development activities for State licensing agency personnel.

In October, the planning subcommittee heard a report on a follow-up study by AIR—a field test of the accreditation users guide by six accrediting agencies. The field test, funded for under \$10,000, is scheduled for completion in June 1979.

2. Project by the New England Association of Schools and Colleges to Develop a Model Training Program for Site Evaluators.

In October, the planning subcommittee discussed this project, funded by the Office of Education for less than \$10,000. It is scheduled for completion in December 1979.

3. Educational Testing Service Project to Develop an Interpretive Guidebook on the Criteria for Recognition of National Accrediting Bodies and State Approval Agencies.

The planning subcommittee reviewed this project in October. Funded by the Office of Education for less than \$10,000, and scheduled for completion in 1979, the project will result in the development of an interpretive guide to assist staff, Advisory Committee, and petitioning agencies in interpreting and documenting compliance with the Criteria for Recognition.

PUBLICATIONS PROPOSED, SPONSORED, OR ISSUED BY THE OFFICE OF EDUCATION

The Advisory Committee, in October, November and December, reviewed various publications issued or sponsored by the Office of Education. It also reviewed the status of preparations for other publications. Publications discussed by the Committee were:

Executive Summary of the National Conference on State Postsecondary Education Institutional Authorization and Oversight, Colorado Springs, Colorado, July 11-14, 1978

Proceedings of the National Conference on State Postsecondary Education Institutional Authorization and Oversight, Colorado Springs, Colorado, July 11-14, 1978

Accredited Postsecondary Institutions and Programs (scheduled for publication annually, beginning in 1979, after a seven-year suspension)

CONFERENCES PROPOSED, SPONSORED OR CO-SPONSORED BY THE OFFICE OF EDUCATION

In March and October, the Committee reviewed the status of preparation for the following conferences:

National Conference on State Postsecondary Education Institutional Authorization and Oversight, Colorado Springs, Colorado, July 11-14, 1978

National Conference on Accreditation and the Protection of the Student as Consumer, Chicago, Illinois, November 20-21, 1978

National Conference on Accreditation in Allied Health Education (no date or location yet)

National Conference on Accreditation and the Public Interest (probable date: June 1980; no location yet)

MISCELLANY

In January, the Committee reviewed the draft of a handbook for Advisory Committee members and consultants, and provided comments to the staff. In March, the Committee reviewed highlights of the June 14-15, 1977, National Conference on the Federal Government's Relationship with the Nationally Recognized Accrediting Agencies, and identified items for future discussion. At two of its meetings (March and November), a draft of a GAO Report on the Office of Education's Eligibility System

was reviewed. The Committee reserved its comment for publication of the final report.

List of Written Materials Reviewed by the Committee and Oral Presentations Concerning Policy Issues

1. Criteria for Recognition of National Accrediting Bodies and State Approval Agencies

Written Materials

March: *Analysis of the U.S. Office of Education's Role in Recognizing Accrediting Agencies*, January 15, 1978 (with attachments: (1) *A Brief Analysis of the U.S. Office of Education's Role in Recognizing Accrediting Agencies*, prepared by the Council on Postsecondary Accreditation; and (2) *Responsibility Conferred on U.S. Commissioner of Education to List Accrediting Agencies under Statutory Provisions Related to Program Eligibility of Accredited Institutions*, March 8, 1978, prepared by the Office of the General Counsel, Department of Health, Education, and Welfare); *COPA President's Bulletin*, February 3, 1978; letter of February 2, 1978, to John R. Proffitt from Lyle E. Siverson, Executive Director, Accrediting Commission for Schools, Western Association of Schools and Colleges, containing comments on the Office of Education's recognition role.

December: Second draft (12/1/78) of the notice of proposed rulemaking; chart describing the proposed criteria, with DEAE staff comments on the significance of the proposed revisions.

Oral Presentation

March: Margaret Conway, Attorney-Advisor, Office of the General Counsel, Department of Health, Education, and Welfare

2. Issues Regarding Reauthorization of the Higher Education Act of 1965

Written Materials

December: *Minimum Quality, Public Trust and National Stewardship: Issues in Institutional Eligibility*, submitted by DEAE; *Eligible Postsecondary Educational Institutions*, September 1978, submitted by DEAE; *Statement Presented to the U.S. Commissioner of Education's Advisory Committee on Accreditation and Institutional Eligibility*, December 14, 1978, by Kenneth E. Young, President, Council on Postsecondary Accreditation.

Oral Presentation

December: Kenneth E. Young, President, Council on Postsecondary Accreditation.

3. Policy Regarding Determination of Eligibility of Foreign Medical Schools for Participation in the Guaranteed Student Loan Program

Written Materials

January: *Determining the "Comparability" of Foreign Medical Schools: A Discussion and Plan of Action*, January 1978, submitted by the Institutional Eligibility Branch, DEAE; report of the panel convened to review the issue, March 10, 1978, submitted by Barbara H. Knudson.

Oral Presentations

January: Barbara H. Knudson, Professor of Continuing Education and Criminal Justice Studies, University of Minnesota at Minneapolis; Leslie W.

Ross, Acting Chief, Institutional Eligibility Branch, DEAE; Joseph M. Hardman, Chief, College Eligibility Section, Institutional Eligibility Branch, DEAE.

4. American Institutes for Research Projects

Written Materials

March: Excerpts from the *Final Technical Report: Improving the Consumer Protection Function in Postsecondary Education*, pp. 3-28, 65-75, October 30, 1976, by Steven M. Jung, et. al., American Institutes for Research; *Monthly Progress Report 31: A Field Test of Accreditation Agency Use of Strategies for Improving the Consumer Protection Function in Postsecondary Education*, by Steven M. Jung, January 1-31, 1977; *Prospectus for a Pilot Test of Accreditation Agency Use of Strategies for Improving the Consumer Protection Function in Postsecondary Education*, June 3, 1977, prepared by AIR; *Executive Summary of the Final Technical Report: A Study in State Oversight in Postsecondary Education*, December 30, 1977, by Steven M. Jung et al. (also reviewed in November); *Self-Study of the Potential for Student Abuse Found in the Policies of One School Involved in the Accreditation Field Test*, January 1978, submitted by Steven M. Jung; *Institutional Self-Study Form for Postsecondary Institutions*, August 1977, AIR; *User Guide for Institutional Self-Study Form*, August 1977, AIR.

Oral Presentation

March: Steven M. Jung, American Institutes for Research.

THE SECRETARY OF HEALTH, EDUCATION, AND WELFARE

CHARTER

Advisory Committee on Accreditation and Institutional Eligibility

PURPOSE

The Commissioner of Education is required by the Veteran's Readjustment Assistance Act of 1952 (P.L. 82-550) and subsequent legislation to publish a list of nationally recognized accrediting agencies or associations and to determine institutional eligibility for participation of education institutions in Federal assistance programs based on accreditation by any such agency or an equivalent approval by a committee appointed by the Commissioner. Discharge of these responsibilities necessitates the advice and counsel of persons knowledgeable in the field of institutional eligibility and accreditation.

AUTHORITY

Public Law 82-550 and subsequent legislation, and Section 9(a)(2) of the Federal Advisory Committee Act (P.L. 92-463). This Committee is governed by provisions of Part D of the General Education Provisions Act (P.L. 90-247 as amended; 20 U.S.C. 1233 et seq.) and the Federal Advisory Committee Act (P.L. 92-463; 5 U.S.C. Appendix I) which set forth standards for the formation and use of advisory committees.

FUNCTIONS

The Committee shall be advisory to the Secretary of Health, Education, and Welfare, the Assistant Secretary for Education, and the Commissioner of Education and shall perform specific functions as follows:

1. Review all current and future policies relating to the responsibility of the Commissioner for the recognition and designation of applicant accrediting agencies and associations as nationally recognized accrediting agencies and associations, and recommend desirable changes in criteria and procedures;
2. Review all current and future policies relating to the responsibility of the Commissioner for the recognition and listing of State agencies wishing to be designated as reliable authority as to the quality of public postsecondary vocational education, and of nurse education, and recommend desirable changes in criteria and procedures;
3. Review and advise the Commissioner of Education in the formation of all current and future policy relating to the matter of institutional eligibility;
4. Review the provisions of current legislation affecting Office of Education responsibility in the area of accreditation and institutional eligibility and suggest needed changes to the Commissioner of Education;
5. Develop and recommend to the Commissioner of Education criteria and procedures for the recognition

- end designation of accrediting agencies and associations in accordance with legislative provisions, Presidential directives, or interagency agreements;
6. Review and recommend to the Commission of Education for designation as nationally recognized accrediting agencies and associations of reliable authority all applicant accrediting agencies and associations which meet criteria established under (5) above;
 7. Develop and recommend to the Commissioner of Education criteria and procedures for the recognition, designation and listing of State agencies in accordance with statutory provisions, Executive Orders, or interagency agreements;
 8. Review and recommend to the Commissioner of Education for designation as State agencies of reliable authority as to the quality of public postsecondary vocational education, and of nurse education, all applicant State agencies which meet criteria established under (7) above;
 9. Develop, under the authority of the Vocational Education Act of 1963, as amended, and recommend for the approval of the Commissioner of Education, standards and criteria for specific categories of private vocational training institutions which have no alternative route by which to establish eligibility for Federal funding programs;
 10. Develop, under the authority of the Higher Education Act of 1965, as amended, and recommend for the approval of the Commissioner of Education, standards and criteria for specific categories of institutions of higher education, for which there is no recognized accrediting agency or association, in order to establish eligibility for participation in the student loan program authorized by Title IV-B thereof;
 11. Maintain a continuous review of Office of Education administrative practice, procedures and judgments relating to accreditation and institutional eligibility and advise the Commissioner of needed changes;
 12. Keep within its purview the accreditation and approval process as it develops in all levels of education;
 13. Advise the Commissioner of Education concerning the relations of the Office with accrediting agencies or associations, or other approval bodies as the Commissioner may request;
 14. Advise the Commissioner of Education, pursuant to the Office of Management and Budget policy dated December 23, 1954, regarding the award of degree-granting status to Federal agencies and institutions;
 15. Not later than June 30 of each year, make an annual report of its activities, findings and recommendations.

STRUCTURE

The Committee shall consist of fifteen members, including the Chairperson, who shall be invited by the Secretary to serve overlapping three-year terms subject to the continuation of the Committee. The Committee shall include persons knowledgeable of secondary and postsecondary education, representatives of the student/youth population, of professional associations, of State Departments of Education and of the general public.

The Committee is authorized to establish two subcommittees for the purpose of reviewing petitions and making recommendations to the full Committee. Each subcommittee shall consist of at least seven persons. The Chairperson of the full Committee may serve on a subcommittee, but not as Chairperson of a

subcommittee. The Chairperson and membership of each subcommittee shall be selected by the Program Delegate to the Committee, with the recommendations and concurrence of the

The Committee is authorized to establish other subcommittees as necessary for the Committee to carry out its functions. The Chairperson and membership of such subcommittees shall be selected by the Program Delegate to the Committee with the recommendations and concurrence of the Committee. The Committee shall inform the Office of Education Committee Management Officer upon establishment of such subcommittees, providing information of the subcommittees membership, functions, duration and estimated number of meetings.

Management and Staff services shall be provided by the Director, Division of Eligibility and Agency Evaluation, Bureau of Higher and Continuing Education, who shall serve as OE Delegate to the Committee.

MEETINGS

The Committee shall meet not less than twice each year at the call of the Chairperson with the advance approval of the Commissioner of Education or the Commissioner's designee. Authorized subcommittees shall ordinarily convene as part of the full Committee's meeting. The subcommittees may occasionally meet at a time and location apart from the meetings of the full Committee, with the concurrence of the Committee Chairperson.

Meetings shall be open to the public except as may be determined otherwise by the Commissioner of Education. Advance

public notice shall be made of all meetings. Meetings shall be conducted, and records kept, as required by applicable laws and Department regulations.

COMPENSATION

Members of the Committee who are not full-time employees of the Government shall be entitled to receive compensation at a rate of \$100 per day plus per diem and travel expenses in accordance with Federal Travel Regulations.

ANNUAL COST ESTIMATES

Estimated annual cost for operating the Committee, including compensation and travel expenses, but excluding staff support is \$75,000. Estimate of annual person-years of staff support required is three at an annual cost of \$55,000.

REPORTS

The Committee shall, not later than June 30 of each year, make an Annual Report to the Congress which shall be submitted with the Commissioner's Annual Report. The Committee's Annual Report shall also be transmitted to the Secretary through the Commissioner and the Assistant Secretary for Education. Copies of the Annual Report shall be sent to the Department Committee Management Officer, the Office of Education Committee Management Officer and the Office of Education Committee Delegate. The Annual Report shall contain as a minimum a list of members and their business addresses, the Committee's functions, a list of dates and places of meetings, and a summary of activities, findings and recommendations during the year.

DURATION

The Advisory Committee on Accreditation and Institutional Eligibility will terminate two years from the date of this Charter unless extension beyond that date is requested and approved by the Secretary.

APPROVED:May 10, 1978

Date

A handwritten signature in cursive script, appearing to read "Ade Champion".Acting Secretary

PART 149—CRITERIA FOR RECOGNITION OF NATIONAL ACCREDITING BODIES AND STATE AGENCIES

Notice of proposed rulemaking with respect to criteria and procedures for recognition of Nationally Recognized Accrediting Agencies and Associations as reliable authorities concerning the quality of education or training offered by educational institutions or programs was published in the *FEDERAL REGISTER* on March 1, 1974 (39 FR 7946). Interested persons were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed rulemaking.

The notice of proposed rulemaking also indicated that the effectiveness of these criteria will be closely monitored during the first year of their implementation. Thereafter, no later than June 1975, the Commissioner of Education intends to propose such further revisions of these criteria as are appropriate in light of this review and other ongoing studies and reports dealing with accreditation and institutional eligibility.

Notice of proposed rulemaking with respect to criteria and procedures for recognition of State Postsecondary Vocational Education Agencies for accreditation of public postsecondary vocational institutions or programs was published in the *FEDERAL REGISTER* on November 30, 1973 (38 FR 33089). Interested parties were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed rulemaking. No comments were received with respect to the criteria for recognition of State postsecondary vocational education agencies.

A. Summary of Comments—Office of Education Response. The following comments were received by the Office of Education regarding the proposed criteria and procedures for recognition of Nationally Recognized Accrediting Agen-

cies and Associations. After a summary of each comment, a response is set forth stating the reasons why no change is deemed necessary prior to field testing the criteria.

1. **Section 149.1 Scope—Comment.** A commenter suggested addition of a policy declaration regarding support by the Office of Education of voluntary accreditation. The same commenter suggested addition of a policy statement regarding State and local control over education.

Response. Policy declarations are not directly germane to regulations such as are set forth in the proposed revised Criteria. The Office still adheres to the policy regarding support of voluntary accreditation, however. The statement regarding State and local control over education is not relevant to the criteria inasmuch as these criteria pertain only to accrediting bodies and not to educational institutions.

2. **Section 149.2 Definitions—Comment.** A commenter suggested substitution of the word "educational" in place of "public" with reference to accreditation.

Response. Despite the fact that accreditation is conducted by private organizations, it is an activity which serves the public.

3. **Section 149.5 Initial recognition; renewal of recognition—Comments.** Two commenters suggested changing the review cycle from four to five, or six years.

Response. Comments received during the period of drafting the criteria recommended review periods ranging from two to ten years. In view of a lack of consensus on this matter, the U.S. Commissioner of Education's Advisory Committee on Accreditation and Institutional Eligibility recommended continuation of the four-year cycle at this time.

4. **Section 149.6(a) Functional aspects—Comments.** Specific comments

were received regarding three subsections of 149.6(a). The comments and responses follow:

Comment. One commenter sought deletion of the requirement to include on visiting teams at least one person who is not a member of the agency's policy or decision-making body or its administrative staff.

Response. This provision is retained in order to protect against conflict of interest situations, where policy, consulting, and decision-making functions are placed in the hands of a small group of individuals. It does not refer to the use of "lay" persons on visiting teams, but rather competent, knowledgeable peers who are not themselves directly involved in the final decision rendered by the accrediting body.

Comment. A commenter suggested addition of a requirement for self-study by accrediting agency staff.

Response. In the judgment of the Office of Education, agency self-study is clearly implicit in the process of preparing a petition for recognition or renewal of recognition.

Comment. A commenter said that there was need for increased specificity regarding the self-analysis requirement.

Response. Accrediting agencies reviewed by the Office cover the increasingly broad spectrum of postsecondary education. This criteria therefore touches only upon what the Office has determined from experience to be the essentials of the process. Variations in the self-analysis process, such as the inclusion of quantitative material and co-operation with other agencies, are left up to individual accrediting agencies.

5. **Section 149.6(b) Responsibility—Comments.** Several comments were received regarding various subsections of

149.6(b). The comments and responses follow:

Comment. Two commenters asked for the deletion of the requirement regarding inclusion of public representatives in the accreditation process.

Response. This provision is retained because, in protecting and advancing the interest of quality education, institutional and program accrediting serve the public interest. There is no reason to fear that by adding a more generalized point of reference, the accreditation process would be made any less insightful. The public component is a complement to the essential professional judgments made in the accreditation review, not a replacement for them.

Comment. Two commenters suggested deletion of the requirement that the current accreditation status and the date of next review be published.

Response. Inasmuch as accreditation serves a public function, the public, prospective students, and employers should be apprised of all institutions which have less than "fully approved" status.

Comment. One commenter suggested revision of the requirement regarding opportunity to comment on revised accreditation standards to provide for such activity to take place through "member institutions."

Response. Accreditation affects other elements of society than educational institutions. Comments from these other elements should flow directly to the accrediting agency without running the risk of dilution or misinterpretation by educational institutions.

Comment. One commenter called for the deletion of the provision for evaluations, other than initial ones, to be carried out without the invitation of the executive officer of the institution.

Response. This provision is retained because it permits accrediting agencies to investigate possible violations of their standards in a timely and effective manner.

Comment. One commenter suggested deletion of the requirement for foster-

ing of ethical practices, such as nondiscrimination and fair tuition refunds.

Response. Since the functions or accrediting agencies affect the public, the agencies should demonstrate responsibility in such areas as discrimination and financial responsibility.

Comment. One commenter suggested the addition of a requirement that accrediting agencies furnish the institution a list of proposed visiting team members and afford the institution the right to accept or reject an individual as a proposed examiner.

Response. This suggestion appears to have reasonable validity, and currently a number of accrediting agencies have such a policy. The Office wishes to consider further whether or not to add this requirement to the criteria.

After consideration of the above comments, Part 149 of Title 45 of the Code of Federal Regulations is amended to read as set forth below.

Effective date. Pursuant to section 431 (b) of the General Provisions Act (20 U.S.C. 1231(b)), these regulations become effective August 20, 1974.

Dated: August 15, 1974.

T. H. BELL,

U.S. Commissioner of Education.

Approved: August 15, 1974.

CAROL W. WEINSTEIN,

Secretary of Health, Education,
and Welfare.

PART 149—COMMISSIONER'S RECOGNITION PROCEDURES FOR NATIONAL ACCREDITING BODIES AND STATE AGENCIES

Subpart A—Criteria for Nationally Recognized Accrediting Agencies and Associations

Sec.

149.1 Scope.

149.2 Definitions.

149.3 Publication of list.

149.4 Inclusion on list.

149.5 Initial recognition; renewal of recognition.

149.6 Criteria.

Authority: (20 U.S.C. 463(b), 1065(b), 1141(a), 1243(11)); (42 U.S.C. 2053a(b), 2053a(c), 2053d-411)(D), 2053a(f)); (8 U.S.C. 1101(a)(15)(F)); (18 U.S.C. 1746c(b)); (38 U.S.C. 1779(a)).

Subpart B—Criteria for State Agencies

Sec.

149.3 Scope.

149.2 Publication of list.

149.3 Inclusion on list.

149.3 Initial recognition; reevaluation.

149.3 Criteria.

Authority: Sec. 493(b) of the Higher Education Act of 1965, Pub. L. 89-320 as amended by Pub. L. 92-318, 86 Stat. 236, 284 (20 U.S.C. 1067-1(b)).

Subpart A—Criteria for Nationally Recognized Accrediting Agencies and Associations

§ 149.1 Scope.

Accreditation of institutions or programs of institutions by agencies or associations nationally recognized by the U.S. Commissioner of Education is a prerequisite to the eligibility for Federal financial assistance of institutions and of the students attending such institutions under a wide variety of federally supported programs. The recognition of such agencies is reflected in lists published by the Commissioner in the Federal Register. Inclusion on such list is dependent upon the Commissioner's finding that any such recognized agency or association is reliable authority as to the quality of training offered. The Commissioner's recognition is granted and the agency or association is included on the list only when it meets the criteria established by the Commissioner and set forth in § 149.6 of this part.

§ 149.2 Definitions.

"Accrediting" means the process whereby an agency or association grants public recognition to a school, institute, college, university, or specialized program of study which meets certain established qualifications and educational standards, as determined through initial and periodic evaluations. The essential purpose of the accreditation process is to provide a professional judgment as to the

quality of the educational institution or program(s) offered, and to encourage continual improvement thereof;

"Adverse accrediting action" means denial of accreditation or preaccreditation status or the withdrawal of accreditation or preaccreditation status;

"Agency or association" means a corporation, association, or other legal entity or unit thereof which has the principal responsibility for carrying out the accrediting function;

"Institutional accreditation" applies to the total institution and signifies that the institution as a whole is achieving its educational objectives satisfactorily;

"Regional" means the conduct of institutional accreditation in three or more States;

"Representatives of the public" means representatives who are laymen in the sense that they are not educators in, or members of, the profession for which the students are being prepared, nor in any way are directly related to the institutions or programs being evaluated;

"States" includes the District of Columbia and territories and possessions of the United States.

(20 U.S.C. 1141(a))

§ 149.3 Publication of list.

Periodically the U.S. Commissioner of Education will publish a list in the *FEDERAL REGISTER* of the accrediting agencies and associations which he determines to be reliable authorities as to the quality of training offered by educational institutions or programs, either in a geographical area or in a specialized field. The general scope of the recognition granted to each of the listed accrediting bodies will also be listed.

(20 U.S.C. 1141(a))

§ 149.4 Inclusion on list.

Any accrediting agency or association which desires to be listed by the Commissioner as meeting the criteria set forth in § 149.6 should apply in writing to the Director, Accreditation and Institutional Eligibility Staff, Bureau of

Postsecondary Education, Office of Education, Washington, D.C. 20202.

§ 149.5 Initial recognition, and renewal of recognition.

(a) For initial recognition and for renewal of recognition, the accrediting agency or association will furnish information establishing its compliance with the criteria set forth in § 149.6. This information may be supplemented by personal interviews or by review of the agency's facilities, records, personnel qualifications, and administrative management. Each agency listed will be reevaluated by the Commissioner at his discretion, but at least once every four years. No adverse decision will become final without affording opportunity for a hearing.

(b) In view of the criteria set forth in § 149.6, it is unlikely that more than one association or agency will qualify for recognition (1) in a defined geographical area of jurisdiction or (2) in a defined field of program specialization within secondary or postsecondary education. If two or more separate organizations in a defined field do seek recognition, they will both be expected to demonstrate need for their activities and show that they collaborate closely so that their accrediting activities do not unduly disrupt the affected institution or program.

(20 U.S.C. 1141(a))

§ 149.6 Criteria.

In requesting designation by the U.S. Commissioner of Education as a nationally recognized accrediting agency or association, an accrediting agency or association must show:

(a) Functional aspects. Its functional aspects will be demonstrated by:

(1) Its scope of operations;

(i) The agency or association is national or regional in its scope of operations.

(ii) The agency or association clearly defines in its charter, by-laws or accrediting standards the scope of its

activities, including the geographical area and the types, and levels of institutions or programs covered.

(2) Its organization:

(i) The agency or association has the administrative personnel and procedures to carry out its operations in a timely and effective manner.

(ii) The agency or association defines its fiscal needs, manages its expenditures, and has adequate financial resources to carry out its operations, as shown by an externally audited financial statement.

(iii) The agency's or association's fees, if any, for the accreditation process do not exceed the reasonable cost of sustaining and improving the process.

(iv) The agency or association uses competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices: (A) to participate on visiting evaluation teams; (B) to engage in consultative services for the evaluation and accreditation process; and (C) to serve on policy and decision-making bodies.

(v) The agency or association includes on each visiting evaluation team at least one person who is not a member of its policy or decision-making body or its administrative staff.

(3) Its procedures:

(i) The agency or association maintains clear definitions of each level of accreditation status and has clearly written procedures for granting, denying, reaffirming, revoking, and reinstating such accredited statuses.

(ii) The agency or association, if it has developed a preaccreditation status, provides for the application of criteria and procedures that are related in an appropriate manner to those employed for accreditation.

(iii) The agency or association requires, as an integral part of its accrediting process, institutional or program self-analysis and an on-site review by a visiting team.

(A) The self-analysis shall be a qualitative assessment of the strengths and limitations of the institution or program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The agency or association provides written and consultative guidance to the institution or program and to the visiting team.

(c) Responsibility. Its responsibility will be demonstrated by the way in which—

(1) Its accreditation in the field in which it operates serves clearly identified needs, as follows:

(d) The agency's or association's accreditation program takes into account the rights, responsibilities, and interests of students, the general public, the academic, professional, or occupational fields involved, and institutions.

(ii) The agency's or association's purposes and objectives are clearly defined in its charter, by-laws, or accrediting standards.

(2) It is responsive to the public interest, in that:

(i) The agency or association includes representatives of the public in its policy and decision-making bodies, or in an advisory or consultative capacity that assures attention by the policy and decision-making bodies.

(ii) The agency or association publishes or otherwise makes publicly available:

(A) The standards by which institutions or programs are evaluated;

(B) The procedures utilized in arriving at decisions regarding the accreditation status of an institution or program;

(C) The current accreditation status of institutions or programs and the date of the next currently scheduled review or reconsideration of accreditation;

(D) The names and affiliations of members of its policy and decision-

making bodies, and the name(s) of its principal administrative personnel;

(E) A description of the ownership, control and type of legal organization of the agency or association.

(iii) The agency or association provides advance notice of proposed or revised standards to all persons, institutions, and organizations significantly affected by its accrediting process, and provides such persons, institutions and organizations adequate opportunity to comment on such standards prior to their adoption.

(iv) The agency or association has written procedures for the review of complaints pertaining to institutional or program quality, as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner that is fair and equitable to the complainant and to the institution or program.

(3) It assures due process in its accrediting procedures, as demonstrated in part by:

(i) Affording initial evaluation of the institutions or programs only when the chief executive officer of the institution applies for accreditation of the institution or any of its programs;

(ii) Providing for adequate discussion during an on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(iii) Furnishing, as a result of an evaluation visit, a written report to the institution or program commenting on areas of strengths, areas needing improvement and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(iv) Providing the chief executive officer of the institution or program with an opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visit-

ing team before the accrediting agency or association takes action on the report;

(v) Evaluating, when appropriate, the report of the visiting team in the presence of a member of the team, preferably the chairman;

(vi) Providing for the withdrawal of accreditation only for cause, after review, or when the institution or program does not permit reevaluation, after due notice;

(vii) Providing the chief executive officer of the institution with a specific statement of reasons for any adverse accrediting action, and notice of the right to appeal such action;

(viii) Establishing and implementing published rules of procedure regarding appeals which will provide for:

(A) No change in the accreditation status of the institution or program pending disposition of an appeal;

(B) Right to a hearing before the appeal body;

(C) Supplying the chief executive officer of the institution with a written decision of the appeal body, including a statement of specifics.

(4) It has demonstrated capability and willingness to foster ethical practices among the institutions or programs which it accredits, including equitable student tuition refunds and nondiscriminatory practices in admissions and employment.

(5) It maintains a program of evaluation of its educational standards designed to assess their validity and reliability.

(6) It secures sufficient qualitative information regarding the institution or program which shows an on-going program evaluation of outputs consistent with the educational goals of the institution or program.

(7) It encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program.

(8) It accredits only those institutions or programs which meet its published standards, and demonstrates that its

standards, policies, and procedures are fairly applied and that its evaluations are conducted and decisions rendered under conditions that assure an impartial and objective judgment.

(8) It reevaluates at reasonable intervals institutions or programs which it has accredited.

(10) It requires that any reference to its accreditation of accredited institutions and programs clearly specifies the areas and levels for which accreditation has been received.

(c) Reliability. Its reliability is demonstrated by—

(1) Acceptance throughout the United States of its policies, evaluation methods, and decisions by educators, educational institutions, licensing bodies, practitioners, and employers;

(2) Regular review of its standards, policies and procedures, in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(3) Not less than two years' experience as an accrediting agency or association;

(4) Reflection in the composition of its policy and decisionmaking bodies of the community of interests directly affected by the scope of its accreditation.

(d) Autonomous. Its autonomy is demonstrated by evidence that—

(1) It performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational program or institution;

(2) It provides in its operating procedures against conflict of interest in the rendering of its judgments and decisions.

(20 U.S.C. 1141(a))

Subpart B—Criteria for State Agencies

§ 149.20 Scope.

(a) Pursuant to section 433(b) of the Higher Education Act of 1965 as amended by Public Law 92-318, the United States Commissioner of Education is required to publish a list of State agencies which he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective States for the purpose of determining eligibility for Federal student assistance programs administered by the Office of Education.

(b) Approval by a State agency included on the list will provide an alternative means of satisfying statutory standards as to the quality of public postsecondary vocational education to be undertaken by students receiving assistance under such programs.

(20 U.S.C. 1087-1(b))

§ 149.21 Publication of list.

Periodically the U.S. Commissioner of Education will publish a list in the *Federal Register* of the State agencies which he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective States.

(20 U.S.C. 1087-1(b))

§ 149.22 Inclusion on list.

Any State agency which desires to be listed by the Commissioner as meeting the criteria set forth in § 149.24 should apply in writing to the Director, Accreditation and Institutional Eligibility Staff, Bureau of Postsecondary Education, Office of Education, Washington, D.C. 20202.

(20 U.S.C. 1087-1(b))

§ 149.23 Initial recognition, and reevaluation.

For initial recognition and for renewal of recognition, the State agency will furnish information establishing its compliance with the criteria set forth in § 149.24. This information may be supplemented by personal interviews or by review of the agency's facilities, records, personnel qualifications, and administrative management. Each agency listed will be reevaluated by the Commissioner at his discretion, but at least once every four years. No adverse decision will become final without affording an opportunity for a hearing.

(20 U.S.C. 1087-1(b))

§ 149.24 Criteria for State agencies.

The following are the criteria which the Commissioner of Education will utilize in designating a State agency as a reliable authority to assess the quality of public postsecondary vocational education in its respective State.

(a) *Functional aspects.* The functional aspects of the State agency must be shown by:

(1) *Its scope of operations.* The agency:

(i) Is statewide in the scope of its operations and is legally authorized to approve public postsecondary vocational institutions or programs;

(ii) Clearly sets forth the scope of its objectives and activities, both as to kinds and levels of public postsecondary vocational institutions or programs covered, and the kinds of operations performed;

(iii) Delineates the process by which it differentiates among and approves programs of varying levels.

(2) *Its organization.* The State agency:

(i) Employs qualified personnel and uses sound procedures to carry out its operations in a timely and effective manner;

(ii) Receives adequate and timely financial support, as shown by its appropriations, to carry out its operations;

(iii) Selects competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices, (A) to participate on visiting teams, (B) to engage in consultative services for the evaluation and approval process, and (C) to serve on decision-making bodies.

(3) *Its procedures.* The State agency:

(i) Maintains clear definitions of approval status and has developed written procedures for granting, reaffirming, revoking, denying, and reinstating approval status;

(ii) Requires, as an integral part of the approval and reappraisal process, institutional or program self-analysis and onsite reviews by visiting teams, and provides written and consultative guidance to institutions or programs and visiting teams.

(A) Self-analysis shall be a qualitative assessment of the strengths and limitations of the instructional program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The visiting team, which includes qualified examiners other than agency staff, reviews instructional content, methods and resources, administrative management, student services, and facilities. It prepares written reports and recommendations for use by the State agency.

(iii) Reevaluates at reasonable and regularly scheduled intervals institutions or programs which it has approved.

(b) Responsibility and reliability. The responsibility and reliability of the State agency will be demonstrated by:

(i) Its responsiveness to the public interest. The State agency:

(i) Has an advisory body which provides for representation from public employment services and employers, employees, postsecondary vocational educators, students, and the general public, including minority groups. Among its functions, this structure provides counsel to the State agency relating to the development of standards, operating procedures and policy, and interprets the educational needs and manpower projections of the State's public postsecondary vocational education system;

(ii) Demonstrates that the advisory body makes a real and meaningful contribution to the approval process;

(iii) Provides advance public notice of proposed or revised standards or regulations through its regular channels of communications, supplemented, if necessary, with direct communication to inform interested members of the affected community, in addition, it provides such persons the opportunity to comment on the standards or regulations prior to their adoption;

(iv) Secures sufficient qualitative information regarding the applicant institution or program to enable the institution or program to demonstrate that it has an ongoing program of evaluation of outputs consistent with its educational goals;

(v) Encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program;

(vi) Demonstrates that it approves only those institutions or programs

which meet its published standards; that its standards, policies, and procedures are fairly applied; and that its evaluations are conducted and decisions are rendered under conditions that assure an impartial and objective judgment;

(vii) Regularly reviews its standards, policies and procedures in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(viii) Performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational institution or program;

(ix) Has written procedures for the review of complaints pertaining to institutional or program quality as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner fair and equitable to the complainant and to the institution or program;

(x) Annually makes available to the public (A) its policies for approval, (B) reports of its operations, and (C) list of institutions or programs which it has approved;

(xi) Requires each approved school or program to report on changes instituted to determine continued compliance with standards or regulations;

(xii) Confers regularly with counterpart agencies that have similar responsibilities in other and neighboring States about methods and techniques that may be used to meet those responsibilities.

(2) Its assurances that due process is accorded to institutions or programs seeking approval. The State agency:

(i) Provides for adequate discussion during the on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(ii) Furnishes as a result of the evaluation visit, a written report to the institution or program commenting on areas of strength, areas needing improvement, and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(iii) Provides the chief executive officer of the institution or program with opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the agency takes action on the report;

(iv) Provides the chief executive officer of the institution with a specific statement of reasons for any adverse action, and notice of the right to appeal such action before an appeal body designated for that purpose;

(v) Publishes rules of procedure regarding appeals;

(vi) Continues the approval status of the institution or program pending disposition of an appeal;

(vii) Furnishes the chief executive officer of the institution or program with a written decision of the appeal body, including a statement of its reasons therefor.

(c) Capacity to foster ethical practices. The State agency must demonstrate its capability and willingness to foster ethical practices by showing that it:

(i) Promotes a well-defined set of ethical standards governing institutional or programmatic practices, including recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services;

(ii) Maintains appropriate review in relation to the ethical practices of each approved institution or program.

(20 U.S.G. 1087-1(b))

[FBI Doc. 74-19298 Filed 8-10-74; 8:45 am]

APPENDIX IV

CRITERIA FOR RECOGNITION OF STATE AGENCIES FOR THE APPROVAL OF NURSE EDUCATION

For the purpose of determining eligibility for Federal assistance, pursuant to Public Law 88-581, as amended, the United States Commissioner of Education is required to publish a list of recognized accrediting bodies, and of State agencies, which he determines to be reliable authorities as to the quality of training offered by schools and programs for diploma, associate degree, and baccalaureate and graduate degrees in nursing. In pursuance of this mandate, the following criteria for recognition of State agencies were established and published in the January 16, 1969 *Federal Register*.

CRITERIA

The following are the criteria which the Commissioner of Education will utilize in determining whether a State agency is reliable authority as to the quality of training offered by schools of nursing.

The State agency:

1. is statewide in the scope of its operations and is legally authorized to accredit schools of nursing.
2. Makes publicly available:
 - a. Current information covering its criteria or standards for accreditation;
 - b. Reports of its operations;
 - c. Lists of schools of nursing which it has accredited.

3. Has an adequate organization and effective procedures, administered by a qualified board and staff, to maintain its operations on a professional basis. Among the factors to be considered in this connection are that the agency:
 - a. Uses experienced and qualified examiners to visit schools of nursing to examine educational objectives, to inspect courses, programs, administrative practices, services and facilities and to prepare written reports and recommendations for the use of the reviewing body—and causes such examinations to be conducted under conditions that assure an impartial and objective judgment;
 - b. Secures sufficient and pertinent data concerning the qualitative aspects of the school's educational program;
 - c. Requires each school of nursing accredited to follow clearly defined refund policies governing all fees and tuition paid by students;
 - d. Enforces a well defined set of standards regarding a school's ethical practices, including recruitment and advertising;
 - e. Requires each school of nursing accredited to submit a comprehensive annual report, including current data on:
 - (1) Progress toward achievement of its stated objectives in nursing education;

- (2) Qualifications and major responsibilities of the dean or director and of each faculty member;
 - (3) Policies used for selection, promotion, and graduation of students;
 - (4) Practices followed in safeguarding the health and well-being of students;
 - (5) Current enrollment by class and student-teacher ratios;
 - (6) Number of admissions to school per year for past 5 years;
 - (7) Number of graduations from school per year for past 5 years;
 - (8) Performance of students on State board examinations for past 5 years;
 - (9) Curriculum plan;
 - (10) Brief course description;
 - (11) Descriptions of resources and facilities, clinical areas, and contractual arrangements which reflect upon the academic program.
- f. Regularly, but at least every 2 years, obtains from each accredited school of nursing:
 - (1) A copy of its audited fiscal report, including a statement of income and expenditures;
 - (2) A current catalog.
 - g. Makes initial and periodic on-site inspections of each school of nursing accredited.
- 4. Has clear, written procedures for (a) the accreditation of a school of nursing or institution, (b) placing it on a probationary status, (c) revoking the accreditation, and (d) reinstating accreditation.

December 1, 1976

**ISSUANCE OF A DETERMINATION OF SATISFACTORY ASSURANCE BY THE
U.S. COMMISSIONER OF EDUCATION
(Outline of Procedures)**

When a public or nonprofit institution has met all the statutory requirements for institutional eligibility except accreditation or its alternatives, the Commissioner of Education may determine that there is satisfactory assurance, considering the resources available to the institution, the period of time, if any, during which it has operated, the effort it is making to meet accreditation standards, and the purpose for which this determination is being made, that the institution will meet the accreditation standards of a nationally recognized accrediting agency or association within a reasonable period of time. Based in part on a determination of satisfactory assurance, the institution would then be cited as eligible to apply for participation in various Federal education programs.

An institution may establish satisfactory assurance by the procedures outlined below or by achieving preaccredited status with a nationally recognized accrediting agency when such preaccredited status is within the scope of recognition of the agency.

As an alternative to preaccredited status, an institution may pursue the following procedure in seeking a determination of satisfactory assurance from the Commissioner. When it has been determined by the Division of Eligibility and Agency Evaluation based on appropriate documentation that an institution has met all the statutory requirements for institutional eligibility except accreditation or its alternatives, the institu-

tion is then requested to provide the following documentation before the satisfactory assurance procedure may proceed:

1. Three copies of the institutional status report or self-study which has been accepted by a nationally recognized accrediting agency;
2. A copy of the response from that nationally recognized accrediting agency indicating that it has accepted the institution's status report or self-study as the basis for authorizing or scheduling a site visit by an evaluation team;
3. Three copies of the latest externally audited financial statement certified by a certified public accountant (the statement shall have been prepared within the last 12 months prior to any site visit scheduled by the U.S. Office of Education).

After the necessary documents are received by DEAE, the Office of Education may schedule a visit to the institution by a team of consultants possibly including one Federal employee. The team will review the institution's current progress toward accreditation. The team report and the institution's application will be reviewed by the Advisory Committee on Accreditation and Institutional Eligibility which will make a recommendation to the Commissioner regarding the institution's progress. Based upon the

various documents submitted and the Advisory Committee's recommendation, the Commissioner of Education will issue a determination whether there is satisfactory assurance that the institution will achieve accreditation within a reasonable period of time. Such a determination

may not extend beyond one year in duration, and may be renewed for only one additional year.

Any adverse action by the accrediting agency after a determination, including denial or deferment of status, may terminate the Commissioner's determination of satisfactory assurance.

NATIONALLY RECOGNIZED ACCREDITING AGENCIES AND ASSOCIATIONS

**Regional Institutional Accrediting
Agencies and Associations**

New England Association of Schools and Colleges
Commission on Independent Schools
Commission on Institutions of Higher Education
Commission on Public Schools
Commission on Vocational, Technical, Career Institutions

Regional Institutional Accrediting Commissions

Accrediting Commission for Community and Junior Colleges,
Western Association of Schools and Colleges

Accrediting Commission for Schools, Western Association of
Schools and Colleges

Accrediting Commission for Senior Colleges and Universities,
Western Association of Schools and Colleges

Commission on Colleges, Northwest Association of Schools
and Colleges

Commission on Colleges, Southern Association of Colleges
and Schools

Commission on Higher Education, Middle States Association
of Colleges and Schools

Commission on Institutions of Higher Education, North Central
Association of Colleges and Schools

Commission on Occupational Education Institutions, Southern
Association of Colleges and Schools

Commission on Schools, North Central Association of Col-
leges and Schools

**National Institutional and Specialized Accrediting
Agencies and Associations**

Accrediting Bureau of Health Education Schools

Accrediting Commission on Education for Health Services Ad-
ministration

American Assembly of Collegiate Schools of Business
Accreditation Council

American Association for Marriage and Family Therapy
Committee on Accreditation for Marriage and Family
Therapy Education

American Association of Bible Colleges
Commission on Accrediting

American Association of Blood Banks
Subcommittee on Accreditation

American Association of Medical Assistants
Curriculum Review Board

American Association of Nurse Anesthetists
Council on Accreditation of Educational Programs of
Nurse Anesthesia

American Bar Association
Council of the Section of Legal Education and Admis-
sions to the Bar

American Board of Funeral Service Education Commission of Schools	American Psychological Association Committee on Accreditation
American Council on Education for Journalism Accrediting Committee	American Society of Cytology Cytotechnology Programs Review Committee
American Council on Pharmaceutical Education	American Society of Landscape Architects Landscape Architectural Accreditation Board
American Dental Association Commission on Accreditation of Dental and Dental Auxiliary Programs	American Speech and Hearing Association American Boards of Examiners in Speech Pathology and Audiology
American Dietetic Association Commission on Evaluation of Dietetic Education	American Veterinary Medical Association Committee on Animal Technician Activities and Training Council on Education
American Library Association Committee on Accreditation	Association for Clinical Pastoral Education, Inc.
American Medical Association Committee on Allied Health Education and Accreditation	Association of Advanced Rabbinical and Talmudic Schools Accreditation Commission
American Medical Record Association Education and Registration Committee	Association of Independent Colleges and Schools Accrediting Commission
American Occupational Therapy Association Accreditation Committee	Association of Theological Schools in the United States and Canada Commission on Accrediting
American Optometric Association Council on Optometric Education	Cosmetology Accrediting Commission
American Osteopathic Association	Council for Non-Collegiate Continuing Education Accrediting Commission
American Physical Therapy Association Committee on Accreditation in Education	Council on Chiropractic Education Commission on Accreditation
American Podiatry Association Council on Podiatry Education	Council on Education for Public Health

Council on Social Work Education
Commission on Accreditation

Engineer's Council for Professional Development

Foundation for Interior Design Education Research
Committee on Accreditation

Joint Commission on Dance and Theater Accreditation

Joint Review Committee for Respiratory Therapy Education

Joint Review Committee on Educational Programs for Physi-
cians' Assistants

Joint Review Committee on Educational Programs in Nuclear
Medicine Technology

Joint Review Committee on Education for the Surgical Tech-
nologist

Joint Review Committee on Education in Radiologic Tech-
nology

Liaison Committee on Medical Education

National Accreditation Council for Agencies Serving the Blind
and Visually Handicapped

National Accrediting Agency for Clinical Laboratory Sciences

National Architectural Accrediting Board, Inc.

National Association for Practical Nurse Education and Serv-
ice, Inc.
Accrediting Review Board

National Association of Schools of Art
Commission on Accreditation and Membership

National Association of Schools of Music

National Association of Trade and Technical Schools
Accrediting Commission

National Council for Accreditation of Teacher Education

National Home Study Council
Accrediting Commission

National League for Nursing, Inc.
Board of Review for Associate Degree Programs
Board of Review for Baccalaureate and Higher Degree
Programs
Board of Review for Diploma Programs
Board of Review for Practical Nursing Programs

New York State Board of Regents

Review Committee for Physical Therapy Education

Society of American Foresters

**STATE AGENCIES RECOGNIZED FOR THE APPROVAL OF
PUBLIC POSTSECONDARY VOCATIONAL EDUCATION**

Arkansas State Board for Vocational Education

Iowa State Board of Public Instruction

Kansas State Board of Education

Minnesota State Board for Vocational-Technical Education

Missouri State Board of Education

New Jersey State Board of Education

New York State Board of Regents

Oklahoma State Board of Vocational and Technical Education
(for approval of postsecondary vocational education
programs and courses offered at area vocational technical
schools which are not offered for college credit)

Oklahoma State Regents for Higher Education (for approval of
vocational education programs for which credit earned is
applied toward a degree, diploma, or other postsecondary
academic or collegiate award, or which are given at State
institutions comprising the Oklahoma State System of High-
er Education)

Utah State Board for Vocational Education

**ACCREDITING AND STATE AGENCIES RECOGNIZED
FOR THE APPROVAL OF NURSE EDUCATION**

**Regional Institutional Accrediting
Agencies and Associations**

New England Association of Schools and Colleges
Commission on Institutions of Higher Education

Regional Institutional Accrediting Commissions

Middle States Association of Colleges and Schools
Commission on Higher Education

North Central Association of Colleges and Schools
Commission on Institutions of Higher Education

Northwest Association of Schools and Colleges
Commission on Colleges

Southern Association of Colleges and Schools
Commission on Colleges

Western Association of Schools and Colleges
Accrediting Commission for Community and Junior Col-
leges
Accrediting Commission for Senior Colleges and Univer-
sities

**National Institutional and Specialized
Accrediting Agencies and Associations***

National League for Nursing, Inc.
Board of Review for Associate Degree Programs
Board of Review for Baccalaureate and Higher Degree
Programs
Board of Review for Diploma Programs

*For certain purposes other than the administration of P.L. 88-581, the National Association for Practical Nurse Education and Service, Inc., has been listed by the U.S. Commissioner of Education as a nationally recognized accrediting agency.

State Agencies

California Board of Registered Nursing

Iowa Board of Nursing

Louisiana State Board of Nurse Examiners

Missouri State Board of Nursing

Montana State Board of Nursing

New Hampshire Board of Nursing Education and Nurse
Registration

New York State Board of Regents (Nursing Education Unit)

West Virginia Board of Examiners for Registered Nurses

ADVISORY COMMITTEE MEETINGS CONDUCTED DURING 1978

January 17-20, 1978 (Thirty-sixth Meeting)

Arlington, Virginia

All sessions open to the public

March 15-17, 1978 (Thirty-seventh)

Arlington, Virginia

All sessions open to the public

June 21-23, 1978 (Thirty-eighth)

Washington, D.C.

All sessions open to the public

October 3-4, 1978 (Subcommittee Planning Session)

Dulles International Airport, Washington, D.C.

All sessions open to the public

November 1-2, 1978 (Thirty-ninth)

Silver Spring, Maryland

All sessions open to the public

December 12-15, 1978 (Fortieth)

Arlington, Virginia

All sessions open to the public

MEETINGS SCHEDULED FOR 1979

March 14-16, 1979
Arlington, Virginia

June 20-22, 1979
Alexandria, Virginia

September 26-28, 1979
Arlington, Virginia

November 1-2, 1979
Place to be announced

December 12-14, 1979
Washington, D.C.

March 1979

SCHEDULE FOR INITIAL EVALUATION AND REEVALUATION OF NATIONALLY RECOGNIZED ACCREDITING AGENCIES AND ASSOCIATIONS, STATE AGENCIES FOR APPROVAL OF PUBLIC POSTSECONDARY VOCATIONAL EDUCATION, AND STATE AGENCIES FOR APPROVAL OF NURSE EDUCATION

Petitions and interim reports should be submitted three months prior to the scheduled review

June 1979	Accrediting Commission on Education for Health Services Administration (Interim) American Medical Association, Committee on Allied Health Education and Accreditation (as a Coordinating agency for allied health education accreditation) (Interim) American Psychological Association, Committee on Accreditation American Veterinary Medical Association, Council on Education Minnesota State Board for Vocational-Technical Education Missouri State Board of Education National Council for Accreditation of Teacher Education National League for Nursing, Inc. Board of Review for Associate Degree Programs Board of Review for Baccalaureate and Higher Degree Programs Board of Review for Diploma Programs Board of Review for Practical Nursing Programs North Central Association of Schools and Colleges, Commission on Schools (Interim)	Oklahoma State Regents for Higher Education (Interim)
	September 1979	American Assembly of Collegiate Schools of Business, Accreditation Council American Physical Therapy Association, Committee on Accreditation in Education Association of Independent Colleges and Schools, Accrediting Commission Liaison Committee on Medical Education National Home Study Council, Accrediting Commission
	December 1979	American Association for Marriage and Family Therapy, Commission on Accreditation for Marriage and Family Therapy Education American Association of Nurse Anesthetists, Council on Accreditation of Educational Programs of Nurse Anesthesia American Medical Association, Committee on Allied Health Education and Accreditation

	<p>Assistant to the Primary Care Physician (Interim)</p> <p>Medical Record Administrator (Interim)</p> <p>Medical Record Technician (Interim)</p> <p>Occupational Therapist (Interim)</p> <p>Respiratory Therapist (Interim)</p> <p>Respiratory Therapy Technician (Interim)</p> <p>Specialist in Blood Bank Technology (Interim)</p> <p>Surgeon's Assistant (Interim)</p> <p>Surgical Technologist (Interim)</p> <p>American Speech and Hearing Association, American Boards of Examiners in Speech Pathology and Audiology</p> <p>Council for Non-Collegiate Continuing Education, Accrediting Commission</p> <p>New York State Board of Regents (as a nationally recognized accrediting agency)</p>	<p>May 1980</p>	<p>American Council on Education for Journalism, Accrediting Committee</p> <p>American Dietetic Association, Commission on Evaluation of Dietetic Education</p> <p>American Society of Landscape Architects, Landscape Architectural Accreditation Board</p> <p>Iowa State Board of Public Instruction</p> <p>National Association of Schools of Art, Commission on Accreditation and Membership</p>
March 1980	<p>American Bar Association, Council of the Section of Legal Education and Admissions to the Bar (Interim)</p> <p>American Podiatry Association, Council on Podiatry Education (Interim)</p> <p>Middle States Association of Colleges and Schools, Commission on Higher Education</p> <p>National Accreditation Council for Agencies Serving the Blind and Visually Handicapped</p> <p>National Architectural Accrediting Board, Inc.</p> <p>National Association for Practical Nurse Education and Service, Inc., Accrediting Review Board</p>	<p>September 1980</p>	<p>Association for Clinical Pastoral Education, Inc.</p> <p>Council on Social Work Education, Commission on Accreditation</p> <p>New England Association of Schools and Colleges</p> <p>Commission on Independent Schools</p> <p>Commission on Institutions of Higher Education</p> <p>Commission on Public Schools</p> <p>Commission on Vocational, Technical, Career Institutions</p>
	<p></p>	<p>December 1980</p>	<p>Accrediting Bureau of Health Education Schools</p> <p>American Board of Funeral Service Education, Commission of Schools</p> <p>American Medical Association, Committee on Allied Health Education and Accreditation</p> <p>Medical Assistant</p> <p>Specialist in Blood Bank Technology</p> <p>Surgical Technologist</p> <p>North Central Association of Colleges and Schools, Commission on Schools</p>

	Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities	December 1981	American Library Association, Committee on Accreditation Arkansas State Board for Vocational Education National Association of Schools of Music North Central Association of Colleges and Schools, Commission on Institutions of Higher Education Oklahoma State Board of Vocational and Technical Education Society of American Foresters
March 1981	American Optometric Association, Council on Optometric Education Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission New York State Board of Regents (for public postsecondary vocational education) Northwest Association of Schools and Colleges, Commission on Colleges Southern Association of Colleges and Schools, Commission on Occupational Education Institutions	May 1982	Accrediting Commission on Education for Health Services Administration American Council on Pharmaceutical Education American Veterinary Medical Association, Committee on Animal Technician Activities and Training Oklahoma State Regents for Higher Education Montana State Board of Nursing
May 1981	American Association of Bible Colleges, Commission on Accrediting Association of Theological Schools in the United States and Canada, Commission on Accrediting	March 1982	American Bar Association, Council of the Section of Legal Education and Admissions to the Bar American Podiatry Association, Council on Podiatry Education
September 1981	American Dental Association, Commission on Accreditation of Dental and Dental Auxiliary Programs Council on Education for Public Health Engineers' Council for Professional Development (first professional degree programs in engineering and associate and baccalaureate degree programs in engineering technology) Kansas State Board of Education	December 1982	American Medical Association, Committee on Allied Health Education and Accreditation (as a coordinating agency for allied health education accreditation) Assistant to the Primary Care Physician Cytotechnologist

Histologic Technician
 Medical Laboratory Technician
 (Associate Degree)
 Medical Laboratory Technician (Cer-
 tificate)
 Medical Record Administrator
 Medical Record Technician
 Medical Technologist
 Nuclear Medicine Technologist

March 1983

Occupational Therapist
 Radiation Therapy Technologist
 Radiographer
 Respiratory Therapist
 Respiratory Therapy Technician
 Surgeon's Assistant

Foundation for Interior Design Education
 Research

COMMITTEE ACTIONS ON PETITIONS, 1978

TYPE OF PETITION		TYPE OF ACTION TAKEN								
		Approved	Denied	Deferred	Requested to Show Cause	Recognition Withdrawn	Accepted	Rejected	No Action Required	
Nationally Recognized Accrediting Agencies and Associations										
Petitions for Initial Recognition	9	3	4	1					1	
Petitions for Renewal of Recognition	23*	19*		2	1	1				
Petitions for Extension of Scope	7	6		1						
Interim Reports	16						15	1		
State Agencies Recognized for the Approval of Public Postsecondary Vocational Education										
Petitions for Renewal of Recognition	3	3								
Withdrawal from Recognized List	2								2	
Interim Reports	3						3			
State Agencies Recognized for the Approval of Nurse Education										
Petitions for Renewal of Recognition	6	6								
Requests for Satisfactory Assurance That Institutions Will Meet Accrediting Standards within Reasonable Period of Time										
	5	4	1							
TOTALS		74	41	5	4	1	1	18	1	3

*Includes a recommendation not acted upon by the Commissioner of Education, and which was superseded by a recommendation at a later meeting

COMMITTEE ACTIONS ON POLICY ISSUES, 1978

POLICY OR ADMINISTRATIVE ISSUE	ACTIONS BY THE COMMITTEE				ACTIONS BY THE COMMISSIONER (WHERE PERTINENT)	
	Recommendation to Commissioner	Reviewed	Recommendation to DEAE	Other	Received	No Action
Criteria for Recognition of Accrediting and State Agencies (15)	12	3				12 (Referred to staff)
Procedures for Appeals of Negative Actions of Commissioner	1					
Institutional Eligibility Regulations	1					
Policy Review Sessions				Scheduled (1)		
Consumer Protection Issues	1					
Eligibility Determination Issues	1					
Task Force on Future Criteria				Conducted joint session (1)		
Criteria for Nurse Approval Agencies			1			
Reauthorization of Higher Education Act of 1985 (8)	5				5	5
Eligibility of Foreign Medical Schools	1					1 (Referred to staff)
Projects Funded by Office of Education (7)		7		Recommendations from 1 project referred to Policy Subcommittee (4)		
Office of Education-Sponsored Publications (3)		3				
Office of Education-Sponsored Conferences (4)		4				
Advisory Committee Handbook		1				
GAO Draft Report on Eligibility (3)		3				
TOTALS	46	18	25	1	6	5
						16

WHOM TO CALL OR WRITE

For information about accreditation and institutional eligibility
For information about the Advisory Committee
For submission of nominations for membership on the Advisory Committee
For submission of petitions for recognition
For inclusion on the DEAE mailing list

John R. Proffitt
Director
Division of Eligibility and Agency Evaluation
Bureau of Higher and Continuing Education
U.S. Office of Education
Washington, D.C. 20202
(202) 245-9875

For information about accreditation policy
For information about petitions for recognition

Ronald S. Pugsley
Acting Chief, Accrediting Agency Evaluation Branch
Division of Eligibility and Agency Evaluation
(Address as above)
(202) 245-2810

For information about institutional eligibility
For information about certifications for foreign students returning home and Americans seeking to work or study abroad

Leslie W. Ross
Acting Chief, Institutional Eligibility Branch
Division of Eligibility and Agency Evaluation
(Address as above)
(202) 245-2940

For information about eligibility of community, junior and senior colleges and graduate institutions

Joseph M. Hardman
Chief, College Eligibility Section
Institutional Eligibility Branch
(Address as above)
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For information about eligibility of occupational schools and programs

Ruth W. Crowley
Chief, Occupational School Eligibility Section
Institutional Eligibility Branch
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(202) 245-9703

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